

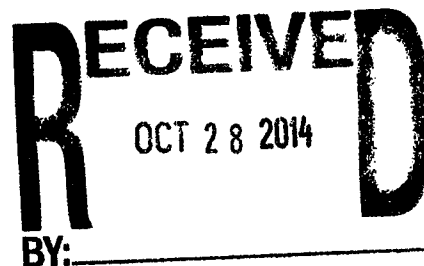


DESERT AND MOUNTAIN CONSERVATION AUTHORITY

44811 North Date Avenue, Suite G
Lancaster, California 93534
Phone (310) 589-3200 • Fax (310) 589-2408

October 23, 2014

Carl Nadela, AICP
Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, California, 90012



Antelope Valley Area Plan Update Draft Environmental Impact Report SCH #2014061043

Dear Mr. Nadela:

The Desert and Mountain Conservation Authority (DMCA), a joint powers authority of the Antelope Valley Resource Conservation District and Santa Monica Mountains Conservancy, works to protect open space and parkland in the Antelope Valley Planning Area. The DMCA commends the County for its visionary approach to resource management and land use planning that runs throughout the draft environmental impact report (DEIR) for the proposed Antelope Valley Area Plan Update. The proposed planning framework, which targets growth into existing areas with supporting infrastructure, is the *only* sustainable way for the Antelope Valley to grow. The DMCA's September 29, 2011 letter Notice of Preparation (NOP) comment letter was not included in the DEIR NOP comments appendix. That 2011 letter is incorporated by reference into this letter. In the context of this general support, the DMCA makes the following specific comments and suggestions.

Further Limiting Biological Impacts

The DMCA applauds several of the County's mobility policies in the DEIR. In particular, minimizing road pavement widths for both rural highways and local streets, which decreases physical footprint and wildlife movement impacts. Additionally, the plan discourages street lighting which will also benefit light sensitive ecosystems in rural areas. However, vehicle-induced mortality continues to be a leading cause of wildlife mortality in Los Angeles County, affecting common and special status species alike. Without adequate crossing facilities, roads divide habitat blocks and become population sinks. Reducing vehicle-wildlife collisions with road design is both a public safety issue and essential to preserving the Antelope Valley's extraordinary environmental setting.

To address these issues, the DMCA requests the following additional policies:

Policy M 3.6: In rural areas, require wildlife crossing structures to be included in rural highway projects. Encourage the use of clear-span bridges whenever feasible and enlarged culverts elsewhere. Fencing should be designed to funnel wildlife to safe crossing points.

Policy M 3.7: Highway improvement projects should incorporate wildlife crossing features whenever feasible and when within wildlife corridors.

Additionally, the DEIR includes a series of appropriate mitigation measures that limit the Plan's impact. Minor adjustments to those mitigation measures will further strengthen and increase their effectiveness. The DMCA is particularly concerned with how biological resources will be assessed on a project-specific level.

The DEIR includes Mitigation Measure BIO-1, which requires an assessment of biological resources on a project-specific level. Mitigation Measure BIO-1 states in part:

“For proposed projects within SEAs, biological resources assessment report shall be prepared to characterize the biological resources on-site, analyze project specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts.”

Based on the above provision of Mitigation Measure BIO-1, a thorough project-specific analysis of constraints on-site is not included as part of the biological resources assessment report. To provide adequate mitigation potential, the biological resources assessment report must encourage the avoidance of impacts to biological resources based on the analysis of site constraints and provide detailed, scaled recommendations to avoid such impacts.

The DMCA recommends that the biological resources assessment report include a distinct biological constraints analysis section that identifies, on detailed figures, which area of a project site and any adjacent Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas should be free of direct impacts, indirect impacts such as lighting and wildlife impermeable fencing.

Furthermore, mitigation measure BIO-3 is ambiguous and does not contain any strong and clear measures enforcing proposed developments to adequately protect wildlife corridors.

The following revisions would address these points:

Mitigation Measure BIO-3: Proposed developments shall be required to be designed so that wildlife movement corridors/ habitat linkages are left in an undisturbed and natural state to protect and preserve significant, viable habitat areas. When proven infeasible,

proposed developments shall be required to incorporate buffers or other measures adequate to protect such areas. Buffer zones shall be established adjacent to areas of important preserved biological resources, including natural streams and drainages. Such buffer zones shall be of an adequate width so as to protect biological resources from grading and construction activities, as well as from the long-term use of adjacent lands, the need for extensive lighting, and increased erosion and runoff, including winter stream flows.

Trail Dedications Require Funding for Implementation

The DEIR includes a series of policies that strongly promote trail development throughout the Antelope Valley Plan Area. The DMCA strongly supports these policies and looks forward to working with the County to implement the Trails Plan. In the DMCA's experience, required trail dedications from developers are difficult to implement without an attached funding source. Unless dedicated trails are also funded and/or constructed, they often sit idle for years until a receiving entity can open them to the public. This constitutes a temporal loss of recreational resources and should be remedied during the development review process by requiring that trail dedications be fully-funded by the developer. Only provision of a fully-functioning trail system mitigates for impacts to recreational resources.

To address this deficiency, the DMCA requests the following revision to Policy M 10.2:

Policy M 10.2: Connect new developments to existing population centers with trails, requiring trail dedication through the development review and permitting process. Require that trail easements be dedicated to an open space agency or other entity acceptable to the County. Require that, when appropriate, trails be constructed or fully-funded as a development permit condition.

Conservation and Open Space Element Will Protect Sensitive Resources

The Conservation and Open Space Element provides the necessary framework to conserve the Antelope Valley's unique and sensitive natural resources. The DMCA strongly supports both the general thrust and many specific policies contained within this element. Many of the strategies proposed for the County are exactly those used by the DMCA in practice. The County would benefit from adoption of these goals and policies County-wide.

The following addition would further strengthen the Conservation and Open Space Element:

Policy COS 7.6: Encourage agricultural activity in previously disturbed areas to reduce habitat loss.

The Open Space goals outlined in the DEIR are appropriate and beneficial. The DMCA looks forward to partnering with the County in their implementation. Minor policy changes would increase specificity and effectiveness under Goal COS 19. First, in the DMCA's experience, third-party conservation easements are a much more effective mechanism than deed restrictions for protecting open space. The DMCA is able to successfully enforce open space restrictions through this mechanism. Second, the County identifies multiple potential strategies that provide economic incentive for rural land conservation. The DMCA is strongly supportive of innovative conservation strategies, such as Transfers of Development Rights (TDR). The plan should include specificity equal to or greater than the County's Draft General Plan regarding these programs, including implementation timelines. Additionally, the Antelope Valley Plan should state the County's intention to partner with the Cities of Palmdale and Lancaster to create an inter-jurisdictional TDR program encompassing the entire Antelope Valley.

The following policy revisions would address these points:

Policy COS 19.3: Allow large contiguous open space areas to be distributed across individual lots so that new development preserves open space while maintaining large lot sizes that are consistent with a rural environment, provided that such open space areas are permanently protected through conservation easements in favor of an open space agency or other entity acceptable to the County.

Policy COS 19.4: Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, In-Lieu Fee Acquisition, and Mitigation Banking, provided that such strategies preserve rural character. Pursue partnerships with the Cities of Palmdale and Lancaster to establish inter-jurisdictional land conservation programs.

It is important to clarify and strengthen the process of conservation easements and land dedications. At the minimum, the plan must require conservation easements to be recorded in an Irrevocable Offer to Dedicate, where the offer shall be irrevocable for a period of 21 years from the date of recording. In addition, the applicant shall provide a current title report with hyperlinks to the County for its file and the use of potential easement holders. It must be incumbent on the landowner (and all future owners) to not affect the title in any way that will degrade the easement. The applicant shall also provide a recordable engineer-stamped metes and bounds, and plotted legal descriptions of both the easement and the servient estate. The Offer to Dedicate defines a time period for which the applicant can make appropriate efforts to find a public agency willing to accept the offer. The applicant shall not declare that dedication of a conservation easement is not feasible before the expiration of the offer.

More importantly, the DMCA opposes the ownership and management of open space lots by a homeowners' association (HOA) – particularly if it is not a conservation easement. We have seen cases where, after a development is built and a HOA becomes involved in the management of the open space, it becomes evident that the HOA goals are contrary to the primary mandate of protecting the biological resources in perpetuity. There is also precedence of HOA s allowing open space lots to go to tax default. Conservation easements however, do survive through a tax default sale by the County.

The infeasibility of a dedication of a conservation easement must be defined to ensure that all applicants have demonstrated satisfactory effort in finding a willing non-profit organization or public entity to accept a conservation easement. This section refers to land divisions where open space lots would be provided.

The following addition would strengthen the Conservation and Open Space Element:

Policy COS 19.4: A maintenance agreement with a Home Owners' Association or Property Owner's Association where demonstrated that dedication to the entities above or a conservation easement is infeasible, only when it is demonstrated that there are no conservation-oriented non-profit organizations and government entities, such as a county, city, state, federal, or joint powers authority willing to accept the dedication of conservation easement or dedication of open space lots.

The applicant must have substantial evidence to demonstrate that the dedication of a conservation easement is not feasible. Letters must be obtained from each contacted public agency stating reasons why that particular agency cannot accept the conservation easement or land. Efforts should be made to ensure that all public agencies capable of accepting conservation easements are contacted, including the DMCA.

The DMCA is among one of the many public agencies in the County that is dedicated to the preservation and management of open space, parklands, watershed lands, trails, and wildlife habitat. The DMCA has the flexibility to accept any conservation easement throughout the Antelope Valley. Furthermore, there are other local, state, federal and non-governmental organizations that are also willing to accept conservation easements in order to help implement Conservation and Open Space Element Goal COS 19.

Land Use Goals for High Desert Corridor Should be Included in Plan Update

The High Desert Corridor (HDC) promises to transform the Antelope Valley. Planning for the HDC is far enough along to develop specific land use and other strategies to mitigate its impacts. Setting aside the merits of the project, the DMCA believes that the County should not wait to craft the principles under which the freeway will be planned and should instead proactively address land use impacts in the current plan update.

The DMCA wrote a detailed letter as part of the HDC project scoping in October 2010 (attached) describing the project's potential impacts. In the 2010 letter, the DMCA outlined a two-fold approach to planning for the HDC. First, the physical design of the project should minimize impacts to biological resources including clear-span bridges and other strategies to maximize the permeability of the corridor to wildlife movement. While project design is outside the scope of the plan update, general design principles are appropriate to include as plan policies.

Second, improvements to the transportation system should be evaluated in a dynamic planning relationship with land use policy. In much of Los Angeles County, freeways are constructed or widened without consideration of the land use changes that result. Capacity expansions frequently induce changes in housing and employment patterns that negate congestion-reduction benefits in just a few years after project completion. Without travel demand strategies, such as accurate pricing, and strong land use controls, regional transportation improvements fall victim to commute-related congestion.

Therefore, the DMCA requests the following additional policy:

Policy M 6.9: In planning for all regional transportation systems, consider and mitigate potential impacts to wildlife movement and other biological resources in project selection and design, and coordinate transportation improvements with land use strategies to minimize habitat loss and maximize connectivity.

The construction of the HDC must not prompt a departure from the vision of the plan update. The DMCA is concerned that, without strong land use controls, access to greater remote areas will induce future growth patterns typical of the pre-housing bust Antelope Valley.

The 2010 DMCA letter proposed a series of land use and acquisition mitigation measures that support the draft plan's vision of a mosaic of rural communities amidst an extraordinary environmental setting. The DMCA requests that the plan update narrow the scope of future expected changes to increasing economic opportunity within existing communities. The DMCA further requests that the vision for a limited-access, freight-priority corridor surrounded by open space be incorporated into the County plan. The HDC should only provide access to existing communities and decidedly avoid growth-inducing access to rural preserve areas.

To ensure compatibility of the HDC with the plan's vision statement, the DMCA requests the following policy additions and revisions:

Policy M 5.1: Support the development of the High Desert Corridor to provide a route for truck traffic between Interstate 5, State Route 14, and Interstate 15. Employ travel demand strategies, such as tolls and congestion pricing, to ensure the priority of freight movement on the High Desert Corridor.

Carl Nadela, Regional Planner
Antelope Valley Area Plan Update DEIR
October 23, 2014
Page 7

Policy M 6.10: Discourage new transportation improvements in rural preserve areas. Prohibit new freeway interchanges in rural preserve areas, except to provide direct access to existing rural town areas.

DMCA Revisions Would Strengthen Plan Update

The Antelope Valley Area Plan Update is truly a landmark event in the sustainable future of the Antelope Valley. It changes course from decades of poorly managed growth and charts a path forward ameliorating the environmental effects of past decisions. The County deserves credit for advancing a community-based, environmentally sound vision for the Antelope Valley's development. The above changes are minor in nature and complementary with plan's vision statement. The DMCA looks forward to review the Final Environmental Impact Report upon its availability.

If you have any questions, please contact Paul Edelman, Chief of Natural Resources and Planning, at (310) 589-3230, ext. 128.

Sincerely,

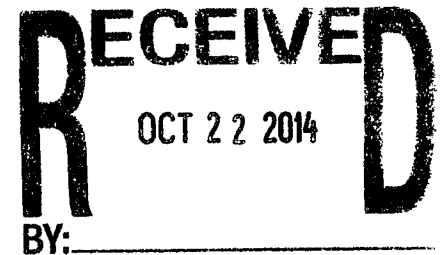
A handwritten signature in black ink, appearing to read "Jim Dodson", written in a cursive style.

JIM DODSON
Chair

Paul E. E ET AL Jones Sr.
Paul E. and Dorothy A. E ET AL Jones Sr.
6019 Devonshire Drive
Palmdale, CA 93551
September 26, 2014

Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

APN: 3175-018-0003
APN: 3175-018-0004



Dear Sir/Madam:

We, as home and property owners' object to the projected zone change on East Ave. G in Lancaster, ca 93535, because homes in that area will be greatly affected by the zone change.

There are homes on East Ave. G, Lancaster, CA, from 5th. St. E. to 10th. St. E. These homes were built in the 1950's and 1960's when the zoning was one house per (2 ½) two and one half acre parcels. When these homes and properties were purchased and built, it was with the expectation and intention that we would leave it for our children, grandchildren, and their offspring to build their homes.

We went to the Los Angeles County regional Planning Commission, and spoke to one of the representatives there. She told us the property on Ave. G, west of Division is in the incorporated area of the city of Lancaster. The property East of Division, on Ave. G is in the unincorporated area of Los Angeles County. She said the property on the West side of Division on Ave. G is zoned Industrial. There is a Solar Plant on the south side of Ave. G between Division and Sierra Highway. After the Solar Plant was built on Ave. G, the ground water was affected. The residents who live in the Mobile Home Park on Ave G, directly across the street from the Solar plant experienced a drastic change in their water. It was not safe for human consumption. There was a very rancid order coming from the water. The taste of the water was very bad. They were not able to cook with the water, or even to use the water for bathing. It left a very bad odor on their bodies after bathing in the water. According to what we learned, the problem with the water caused some of the residents of the Mobile Home Park to have to move. They had to relocate to someplace where the water was safe for consumption, etc.

We were told when our well was dug in the 1950's and 1960's (you may already know, or you can check it out for yourself) that the underground water flows from southwest to northeast. 95% of the air flow is from west to east.

Paul E. Jones Sr. E ET AL
September 27, 2014
Page 2

We are asking the Regional Planning Commission to reconsider making this zone change. Please let it remain D2 zoning. We believe changing the zoning to industrial in this area from Division St. to 20th. St east, and from East Ave. F, to Ave. H East will hurt the environment (water and air).

If changed to industrial zoning, and factories were built, this entire area will suffer loss, and hinder future development.

The homes from 5th. St East to 10th. St, East use well water. This is our only source of water.

There are homes and living quarters scattered from Division to 30th. St. East. Many of these homes are on acreage and were built years ago. Industrial zoning, factories, etc., would greatly affect the quality of life for these residents and homeowners.

As you can see, our concern is not only for ourselves, but for all property owners in this proposed zone change area.

A zone change in the proposed area will greatly limit or stop growth in this part of the Antelope Valley.

Thank you for your support.

Sincerely,

A handwritten signature in cursive script that reads "Paul E. Jones Sr.".

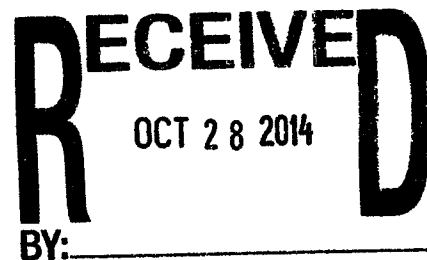
Paul E. Jones Sr., E ET AL

Association of Rural Town Councils
Susan Zahnter, Interim Director
C/O Three Points-Liebre Mountain Town Council
P O Box 76
Lake Hughes, CA 93532
661.724.2043
3pointsliebremountain@gmail.com
www.threepointstowncouncil.com

17 October 2014

SENT VIA EMAIL, US MAIL

Carl Nadela, AICP, Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1356.
Los Angeles, CA 90012
cnadela@planning.lacounty.gov



Dear Mr. Nadela,

This is to inform you of the resignation of Mr. Vance Pomeroy as director of the Association of Rural Town Councils (ARTC). We also request that his testimony and comments made on behalf of the ARTC, without our prior knowledge or consent, be attributed to him, personally, and not to the ARTC. Details are provided in the attached letter and enclosures.

Sincerely,

A handwritten signature in cursive script that reads "Susan Zahnter".

Susan Zahnter
Interim Director

Association of Rural Town Councils
Susan Zahnter
C/O Three Points-Liebre Mountain Town Council
P O Box 76
Lake Hughes, CA 93532
3pointsliebremountain@gmail.com
661.724.2043

17 October 2014

SENT VIA EMAIL, US MAIL

Supervisor Michael D. Antonovich
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 869
Los Angeles, CA 90012
FifthDistrict@lacbos.org

Dear Supervisor Antonovich,

Mr. Vance Pomeroy recently tendered his resignation as director of the Association of Rural Town Councils (ARTC). After his resignation, members of the ARTC were made aware of a letter sent by Mr. Pomeroy to your office, dated 11 July 2014, containing comments pertinent to the Antelope Valley Area Plan, that was signed by Mr. Pomeroy as director of the ARTC. The members of the ARTC have also been made aware of a situation in which Mr. Pomeroy advanced his opinion, as director, through testimony to the Board of Supervisors regarding the promotion of a separate environmental impact review for the Antelope Valley Area Plan on 11 June 2013.

Please be aware that the members of the ARTC, without commenting on the content of Mr. Pomeroy's communications, were not advised, either before or after the sending of the communiqués, that Mr. Pomeroy would be writing any opinion or missive, or speaking on their behalf. Therefore, the members of the ARTC request that the above-referenced communications be attributed to Mr. Pomeroy solely as an individual or citizen and not as the director of the Association of Rural Town Councils. Mr. Pomeroy did not speak for members of the ARTC on those two occasions.

Very truly yours,



Susan Zahnter
Interim Director
Association of Rural Town Councils

Enclosures: 2

CC: Norm Hickling, Edel Vizcarra, Richard Bruckner, Susan Tae, Carl Nadela

Meeting Transcript of the Board of Supervisors

June 11, 2013

98

SUP. RIDLEY-THOMAS, CHAIRMAN:
SIR? MAY I CALL TO YOUR

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ATTENTION THAT YOUR TIME HAS EXPIRED.

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HARVEY HOLLOWAY:
OKAY.

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5

SUP. RIDLEY-THOMAS, CHAIRMAN:
HMM. DO YOU WANT TO GIVE US A

6

WRAP UP SENTENCE?

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8

HARVEY HOLLOWAY:

I

WOULD. OUR COMMITTEE ALSO BELIEVES THIS IS

9

AN ISSUE INCLUDES A MATTER OF EQUITY THAT THE PROCESS FOR THE
10 ANTELOPE VALLEY PLAN SHOULD BE NO DIFFERENT THAN OTHERS SUCH

11

AS THE ONE VALLEY ONE VISION PROCESS IN SANTA CLARITA,

12

DIRECTLY ADJACENT TO THE ANTELOPE VALLEY AREA PLAN AND THE

13

THIRD STREET SPECIFIC PLAN PROCESS IN SUPERVISOR MOLINA'S

14

DISTRICT. THANK YOU FOR YOUR TIME.

15

16

SUP. RIDLEY-THOMAS, CHAIRMAN:

WE

THANK YOU FOR YOUR TESTIMONY.

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NEXT SPEAKER, PLEASE.

18

19

VANCE POMEROY:

VERY GOOD. MY NAME IS VANCE POMEROY. I'M IN

20

SUPPORT OF SUPERVISOR ANTONOVICH'S MOTION FOR THE SEPARATION

21

OF THE E.I.R. WORK. I SPEAK HERE WITH MANY PEOPLE BEHIND ME.

22

I'M THE DIRECTOR OF THE ASSOCIATION OF RURAL TOWN COUNCILS

23

24 REPRESENTING THOUSANDS OF RESIDENTS OF THE ANTELOPE VALLEY. IN
25 ADDITION, WHILE NOT SPEAKING ON BEHALF OF THE BOARD OF
June 11, 2013
99 TRUSTEES, I'M ALSO A MEMBER OF THE CAPITAL UNION SCHOOL
1 DISTRICT BOARD AND THE DIFFERENT SCHOOL DISTRICTS REPRESENTS
2 THOUSANDS OF CHILDREN WHO WILL BENEFIT BY THE CONTINUED WORK
3 OF THE REGIONAL PLANNING DEPARTMENT'S WORK ON THE ANTELOPE
4 VALLEY AREA WIDE PLAN. BESIDES THAT, I AM A PROFESSIONAL
5 PLANNER FOR THE PAST 29 YEARS, REPRESENTING INDUSTRY AND
6 GOVERNMENT AT ALL LEVELS OF JURISDICTIONS ACROSS THE STATE.
7 I'VE BEEN A STRONG SUPPORTER OF THE DEPARTMENT OF REGIONAL
8 PLANNING'S WORK AND THE DECISION TO PREPARE THE GENERAL PLAN
9 AND OTHER PLANNING DOCUMENTS IN-HOUSE RATHER THAN BRINGING IN
10 CONSULTANTS. IT'S IMPORTANT, IT'S MUCH MORE MEANINGFUL AND
11 PRODUCTIVE APPROACH. IT ALLOWS FOR A STRONG BOTTOM-UP EMPHASIS
12 THAT REALLY PLAYS ON THE STRENGTHS OF LOCAL KNOWLEDGE AND THE
13 BETTER DESIRES OF THE FOLKS DIRECTLY AFFECTED BY THE DECISIONS
14 MADE HERE DOWNTOWN. I WAS HONORED TO SPEAK ON BEHALF OF
15 RESIDENTS OF THE COUNTY IN 2008 ON THE TOWN AND COUNTRY PLAN
16 AT THE VALLEY-WIDE PRESENTATION. ANTELOPE VALLEY IS A SPECIAL
17 PLACE AS ARE ALL THE OTHER SPECIAL PLACES IN THE COUNTY THAT
18 HAVE BEEN AFFORDED A SEPARATE AND INDIVIDUAL ENVIRONMENTAL
19 PROCESS. I THINK THAT'S VERY IMPORTANT IN THIS CASE. WE HAVE
20 COME SO FAR IN THE PROCESS, BUT THE EARLY ENGAGEMENT OF THE
21 COMMUNITIES, NOW IS THE BETTER TIME TO ENGAGE IN THE DETAILS
22 AND THE FINAL PLAN TO KEEP THE CONVERSATIONS FOCUSED ON OUR
23 OWN COMMUNITIES, ON OUR OWN NEIGHBORHOODS, ON OUR OWN ANTELOPE
24 VALLEY, JUST AS SO MANY OTHER WORTHY COMMUNITIES HAVE BEEN
June 11, 2013

100

AFFORDED IN THE EQUITABLE STAKE IN DETERMINING THEIR OWN

1

FUTURES. BY SEPARATING OUT THE ANTELOPE VALLEY AREA PLAN

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E.I.R., YOU WILL SUPPORT THE BEST PLANNING PRACTICES POSSIBLE

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AND CONTINUE THE HERITAGE OF CIVIC ENGAGEMENT THE DEPARTMENT

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OF REGIONAL PLANNING HAS BEEN KNOWN FOR SINCE MY COUSIN HUGH

5

POMEROY HELPED FOUND IT IN 1923. THANK YOU

Vance Pomeroy

July 11, 2014

Carl Nadela
Regional Planner
Los Angeles County
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
Transmitted via Electronic Mail to: tnc@planning.lacounty.gov

Subject: **Los Angeles County Antelope Valley Areawide General Plan Update**
Comment on scope and content of the environmental information and analysis to be contained in the EIR

Mr. Nadela and Regional Planning Staff:

It is with pleasure that I transmit to you my comments on the scope and content of the upcoming environmental impact report for the update of the Antelope Valley Areawide Plan (AVAP).

As a working professional in the land use field for over thirty years with both heritage in the department and extensive experience in both private and public spheres, I have applauded the department's efforts in tackling the update of the comprehensive plans for the county. While it has taken some time longer than originally envisioned, we are now at a juncture at which we can now better review the details of all of our work.

The Environmental Impact Report for the AVAP will be an important document for the Regional Planning Commission and the Board of Supervisors – I hope that the document provides a thorough examination of the project and a reasonable range of workable alternatives. These alternatives must include real, public-driven options to the project as presented, and be offered up in a way that presents the balance available between their environmental and human value. The key focus of the EIR needs to be *balance*, especially as the work turns to the study and review of project alternatives and how the EIR treats the environmental issue areas that promote human activity and the livability of the valley for the future.

Director, Association of Rural Town Councils
Past President, Juniper Hills Town Council
Telephone / SMS : (661) 361 – 5619 Electronic Mail : vpomeroy@ravenhillranch.com
29319 121st Street East Juniper Hills, California 93543

The following are the topics and details that I believe will make the AVAP EIR meaningful and constructive in spirit that CEQA originally intended EIR's to be: a useful tool of information to give decision makers a range of choices with the best data possible for all alternative projects:

Density vs. Dispersal:

The project appears to dwell on both density and exclusion as the only measure of human activity in the valley. The normal and organic rural land use forms always also include dispersal and the compatible mix of land uses that would be unacceptable in an urban setting. Please address how the focus on population and activity concentration as an exclusive land use planning tool impacts the environment in all the environmental issue areas as well as how its impacts have potential effects beyond the land on which the concentration is places. Address how the inclusion of a rural dispersal model into a diverse collection of land use planning tools and land use forms impacts the environment in the environmental issue areas, and how it may or may not alleviate potential impacts and provide for a more diverse population across the valley.

Land Use Proscription by Pre-defined Constraint:

The land use patterns, densities and designations shown in the AVAP as proposed for the Project were developed under what has been described as a Hazard, Environmental and Resource Constraints Model (ECM) created by the county. The ECM is described as "a tool to inform stakeholders of potential site constraints and regulations" (General Plan Appendix C, Public Review Draft, 1/2014).

However, the "tool to inform" about regulation has become the regulation itself. No linkage is explained. No methodology is provided to provide a connection between the general ideas of the model and the detailed quantitative conclusions and assignments made in the plan.

The ECM is purported to 'front-load' all the underlying environmental hazards, issues, constraining factors and resources (or lack thereof) that could effect the ability of a particular site to be developed with improvements. However, the model's concept as presented does not provide any quantitative analysis or qualitative set of findings or determinations as to how the constraints identified translate into the development designations and densities imposed let alone the three 'classes' identified in the appendix. Additionally, this 'front-loading' was explained by staff as a way to predict the general outcomes of the development process that would occur even without the proposed designations – that any particular parcel could only make it through the existing planning, permitting and improvement processes to the level of the proposed designations. In other words, that the ECM is predictive in nature. (The suggestion that land use designations be predictive of land use patterns is not credible as the imposition of such a model of prediction in the southerly portion of the county as an academic exercise at any point in the 20th century would have rendered this model as false.)

After a thorough analysis of the ECM itself and the underlying data and assumptions, the EIR should address 'how', 'why' and 'with what data' the links between the ECM and the AVAP land use designations were arrived at. This substantiation is critical to all the land use, population, housing and environmental justice analysis throughout the EIR and will also inform many portions of the other areas of review and analysis.

Rural town centers/Rural Town Areas vs. Rural preservation areas:

The AVAP has created hard-line boundaries for existing activity nodes without providing any substantiation for their existence. While a "town center" concept can help focus a balance between housing and jobs, the manner does not provide for the diversity of housing and population that is always found in rural areas of the country and in the existing land use patterns of the Antelope Valley. The areas identified as Rural Town Centers and Rural Town Areas need to include softer edges that allow for reasonable opportunities for the addition of a more diverse set of housing and commercial activities. The other area identified is the Economic Opportunity Areas whose creation is the provision of new locations for reasonable growth within the rural milieu of the valley. However, the down-zoning of the rural preservation areas, which include all remaining unincorporated areas, has the potential to create substantial environmental impacts across the Antelope Valley. The AVAP EIR must address those potential impacts, including, but not limited to, agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation.

The AVAP Project postulates a near vacancy of a substantial amount of the valley. At least one of the Project Alternatives must address a more open, organic (rather than proscribed) maturity of those open portions of the valley so a more diverse pattern of development closer to the existing pattern may continue. In addition, the rural preservation concept may not be consistent with the adopted or proposed with Community Standards Districts. The EIR should include an alternative with the Community Standards Districts zoning. Additionally, the EIR must address the balance of development patterns and development diversity with environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

Community Standards Districts:

The EIR of the AVAP will analyze impacts associated with land use changes and zoning changes proposed by the County. The Land Use portion proposes to down-zone much of the land within currently adopted and proposed Community Standards Districts. The AVAP EIR should address these changes and provide research-based substantiation for those changes. The activities that have lead to the existing and the proposed Community Standards Districts have been vetted by the various communities and any changes via the AVAP to the underlying densities and land use designations have the potential for substantial alterations to housing, population and other human activity-related environmental activities.

No environmental analysis will be considered complete unless the existing district land use patterns are included in most, if not all, project alternatives, including the No Project Alternative.

Significant Ecological Areas:

The AVAP has included portions* of the proposed SEA Ordinance and a significant expansion of over 250,000 acres of SEA designated property in its Land Use Plan. This ordinance has not been approved by the Regional Planning Commission and is still being vetted through public comment. The AVAP should only analyze adopted ordinances and its EIR should not have to study an un-adopted ordinance. With the November, 2014 deadline given by the BOS, the AVAP EIR should not exhaust DRP's consultant's time with the examination of ordinance that may not even be adopted in the future.

Therefore, we ask that the AVAP EIR include an analysis of the approved SEA ordinance only as include it only in Project Alternatives and not the Project as proposed. In that analysis, include detailed scientific, research-based justification for the extent of the proposed designation areas including, but not limited to primary research on the potential impacts on agriculture, biota, geology, hydrology, land use planning, mineral resources, population and housing, delivery of public services, recreation and transportation. Especially because of the extent of the potential degradation of population, housing and other human activity-related environmental activities, justification of the boundaries and the incumbent regulation of that land needs a substantial basis to give the lead agency an opportunity to weigh the impacts. Additionally, the EIR must address the balance of the SEA's to environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

* - The SEA Ordinance has seen more proposed revisions since the publication of the current draft AVAP maps (see SEA Connectivity and Constriction Map, April – June, 2014).

Economic Opportunity Areas:

Identified within the AVAP are three Economic Opportunity Areas (EOAs) centered around major transit corridors that "would bring tremendous opportunities for growth and economic development in the vicinity of these projects". These EOAs would bring stable economic growth for the future generations of the Antelope Valley.

In the AVAP, DRP staff has indicated that further studies and a more detailed planning effort will need to be done for each EOA by way of a Community Plan. The EIR will be inaccurate if some future Community Plan is postulated now with changes to the currently projected AVAP analysis and data. Any discussion of a future Community Plan to re-visit the EOA's must be only part of a Project Alternative and not part of the Project.

The EOA's are an important concrete part of the AVAP and must not have an open-ended reviewing/studying component; They need to be addressed directly in the EIR as the activity nodes that they are. The AVAP EIR must accurately

address any impacts associated with the allotted residential units and projected commercial acreage that will bring jobs/housing to those areas. We ask that the EIR include the EOA's in its analysis as is and that Community Plans not be a part of the AVAP. Future land owners will still have to submit a project level EIR for any development plans they want the County to approve and the EOA concept is already sufficient for programmatic determinations at the AVAP EIR level. This will ensure Los Angeles County's ability to review proposed development within these EOAs in more detailed without adding the unnecessary Community Plan that will alter the EIR currently being drafted. Additionally, the EIR must address how the EOA's balance environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

Use of all the most recent information and studies:

The AVAP is shaping the Antelope Valley for future generations. The EIR must include with its analysis current and proposed transit projects, including NW 138, High Speed Rail and High Desert Corridor. And population growth associated with Southern California Association of Governments RTP/SCS projections. With these projections included in the AVAP EIR, it will give a unified planning effort that will allow the community's future housing and jobs to be pro-active and bring economic growth to that region.

Health Concerns:

The RL-10 and RL-20 will allow one unit per 10 or 20 acres. While the AVAP is trying to create larger lots outside of the rural town centers, this could have a negative effect on both air quality and health impacts. Many lower density lots are graded and cleared of vegetation to allow the full use of the property. This can cause a significant increase in wind and borne dust. The AVAP EIR should address how such low density zones will affect the inherent health problems associated with Valley Fever and other wind-borne health hazards that are directly related to large vacant lots with no or little vegetation or development to break up prevailing winds. Additionally, the EIR must address environmental justice concerns for the existing and potential future human populations and constituencies that will rely on this valley to provide both habitation and sustenance.

School District and Education Issues:

The AVAP EIR must address the potential impacts on the several school districts in the valley (Eastside, Wilsona, Keppel, Gorman, Westside, Acton-Agua Dulce, Antelope Valley Union High School and Antelope Valley College). Each of these sovereign jurisdictions regularly reviews its demographic and growth parameters. The AVAP EIR must address how the activities of the plan effect those plans and policies, and, in so far as is possible, provide how there is a conflict or consistency between the AVAP and the work of each district including but not limited to the areas of land use planning (over which the district hold certain levels of sovereignty), population and housing, delivery of public services, recreation

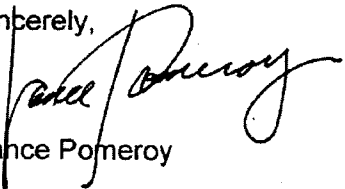
*Antelope Valley Areawide General Plan Update
Comment on EIR scope and content
July 11, 2014*

and transportation. Additionally, the EIR must address environmental justice concerns for the existing and potential future school and residential populations and constituencies that will rely on this valley to provide habitation, sustenance and education. Consideration must also be given to the long term impact that any change in land use has on the delivery of educational services. Decreasing rural density has a profound impact on delivery of instruction, length and cost of transportation, limitations on services to students, loss of revenue to school districts and thus reductions in staff. These may be unintended consequences of the proposed EIR.

I would also like the department to address why the consultant hired to assist the department in the preparation of the EIR was not on hand at any of the scoping sessions and why no scoping notes appear to have been taken by staff at those sessions. Additionally, please comment on how the public was to be sufficiently informed of the full breadth and depth of the proposed draft AVAP Project prior to the July 11, 2014 closure date for scoping comments when portions of the draft AVAP have not yet been finalized and published prior to that date let alone prior to the beginning of the comment period.

Please feel free to contact me with any questions you may have or clarifications you may need. I appreciate your attention and look forward to working with you and staff to keep the Antelope Valley a great place to live.

Sincerely,



Vance Pomeroy

Director, Association of Rural Town Councils
vpomeroy@ravenhillranch.com
Voice / Text : (661) 361-5619

Cc: Susie Tae
Supervisor Antonovich
Edel Vizcarra
Norm Hickling

Antelope Acres, &

OCT 10-14

Mr. Antonovich,

Realizing you will be leaving
office soon I surely you will be voting
on the proposed zone plan involving
Antelope Acres - 70 St West at Ave.

G needs to be left as it is as no
unwanted solar panels end up there.

22 people from 7 families aged
3-90 live in that immediate

area; including my daughter, 2
grandchildren and my husband and I.

Solar panels should not be even
considered where that many people are
calling home. You know solar
fields decrease property values,
obliterate views, increase heat and
use up our very scarce water. They
also have not decreased elect. rates.

We've lived here over
13 years, many families even
longer.

STOP this!

NO Solar Panels thank you.
at 70 St. West & Ave G Coralee Reuter
Antelope Acres Jim Reuter

RECEIVED
OCT 20 2014
BY:

zone change request

A. NEJIM [avdesign21@msn.com]

Sent: Thursday, October 09, 2014 2:55 PM

To: A. NEJIM [avdesign21@msn.com]; DRP Town & Country Project

Subject: APN #3153-017-018

Request for zone change to commercial.

Hi Carl

I talked to you last week and requested that the zoning of the subject property with parcel number 3154-017-018, locate at the intersection of Avenue I and 50th. street east in the city of Lancaster to be change to commercial zoning for the following reasons:

1. The property is located at a major intersection. The intersection is a major traffic route to the east and north (Edward air force base.)
2. There are no services provided in the area . A gas station with mini market will serve the travelers and provide since of security to meet their travel needs.
3. There is no service adjacent to the area .The closest Gas station is about 3 miles to the west (around 20th. street east)
4. The construction of a gas station and mini market will encourage and accelerate the expansion and the building of that area. and eventual tie the vacant land to existing constructed area at the west.
5. Since the prices of the real estate is cheap in that area the project will encourage people who are less fortunate to construct their dream home in this affordable section and in the vacant properties which means additional property taxes to the county.
6. The improvement of the property and will provide additional taxes to the county in form of property taxes.
7. Avenue I in the city of Lancaster to the east is zoned commercial. Many successful businesses operating 3 miles away from this major intersection.
8. Finally , The land is very small and located at major intersection. Traffic noise as well as pollution generated by the traffic will make it very hard to develop it as a single family home and is impossible for any one to live on the property due to noise and size.

Based on the above facts and finding , I am hoping that my application to rezone the property to commercial will be granted.

If you need more information ,please do not hesitate to contact me.

Sincerely ,

ABE NEJIM

ANTELOPE VALLEY DESIGN GROUP INC.

602 COMMERCE AVENUE, SUITE E.

PALMDALE, CA. 93551

(661)945-2480

(661)266-1600

9/26/14

Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, CA. 90012

Att: Carl Nadela

candela@planning.lacounty.gov

NA

Dear Mr. Nadela just wanted to give my input on the Los Angeles County meeting on Saturday 9/27/14 at the Antelope Valley College. My name is David Robinson, I am a property owner located at 37228 10th St. East in Palmdale, CA. 93550. My property fronts Avenues S. I was at the meeting but did not speak out as there were so many people and felt it would be best to put my views in writing.

I wanted to give my support for the proposed zone change just west of the 14 freeway on Avenue S where the Fly Away bus terminal is. I support the change of zoning from R1 to M1 going east to the 14 freeway. Furthermore I believe the trucking parking at that location makes good sense because of the close proximity to the freeway. It keeps the trucks from parking on private property and driving through residential areas when you have such a convenient location.

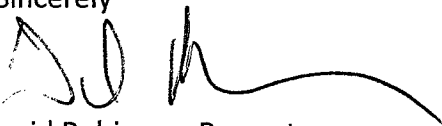
As a property owner on avenue S, I found it necessary to fence my property so that semi trucks would not continue to park on my lot. Large truck parking appears to be a real problem and these hard working people should not have to drive all over town trying to find a place that is not safe and legal.

I heard the gentleman from the Fly Away say he welcomes parking and wanted to continue. *I say let him* he is filling a void and avenue S could not be a better location. It has distant neighbors, close to the freeway, turn lanes in and out and easy to find. Palmdale got what they wanted on Avenue S when they refer to it as the "Transportation Corridor" they have two Park & Rides which they wanted and a transportation company / airport shuttle & charter bus company so why not a truck parking location? It all fits. I know most of the truck traffic goes south to Los Angeles so being the first exit in and out of town will keep trucks off the freeway going north thus a benefit to all of us with less congestion.

I was like most people at the meeting; I agreed and disagree with parts of the plan but this is one zone change that I can relate to and it is needed to resolve semi truck parking problems in our community.

Thank you for allow me to comment and I wish you the best going forward, I can be reached at 760-567-0363 if you have any questions

Sincerely



David Robinson, Property owner.

Carl Nadela

From: marshall.doug@comcast.net
Sent: Thursday, October 02, 2014 9:16 AM
To: Carl Nadela; DRP Town & Country Project
Cc: doug marshall
Subject: Town and County Public Comment to be Incorporated into Final EIR
Attachments: Town County West Side Lancaster Map.pdf; Town and Country East Lancaster Map.pdf; Town and Country East Palmdale Map.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Carl,

The first email I sent you today had the maps upside down. I corrected this with this email and attachments.

Sincerely,

Doug Marshall

9/28/14

Douglas V Marshall
PO Box 421
Pleasanton, Ca. 94566

C/O Carl Nadela, Regional Planner

Community Studies North
Los Angeles County Department of Regional Planning
320 Temple Street
Los Angeles, Ca. 90012

Re: Antelope Valley Area Plan " Town and Country " Project No. R2007-02733-(5)

Carl,

I would like to commend you and your staff for all your patience and education throughout this multi-year process. As an attendee of the Town and Country meetings for many years I have watched your patience in action with many angry and frustrated land owners. Sitting between governments "smart growth " mandates and angry landowners could not have been an easy place to be.

We are the managers/principals of a private equity group that holds more than 500 acres of land in Antelope Valley. As long term land investors, our goal is to always be good stewards of the land while providing well located land to the development community for future economic growth within the Antelope Valley Region. All our parcels are current on property taxes, which runs close to

\$40,000 each year. All parcels are also clean of any violations and are monitored on a regular basis for garbage dumping that occurs with close in parcels to urban areas.

Our request is for LA County to leave open the possibility for increased but balanced development on the large tracts listed below. Most of the land in Antelope Valley is "chopped up" into 1 to 5 acre parcels with tracts larger than 40 acres representing less than 5% of available land. If you were to remove large tracts of land that are located in flood zones or that are located many miles from infrastructure, the percentage of available parcels drop to a very small number. This existing land segmentation, which was allowed many years ago will become a problem for developers/builders in the future, when home building inevitability returns to its historic norm. Builders always want larger tracts of land and reassembling small parcels to make a project pencil out is often a difficult and costly process. Builders have always hop scotched to where large tracts of cheap and available land can be found. The downzoning of land along with increased SEA Zones has the real potential to drive builders to other areas. This will reduce property tax dollars to the county and push jobs to outlying areas. If LA County's estimate of 15,000 new homes being constructed over the next 20 years on county land is correct, then the de-zoning of land will cause more sprawl of people not less. It will also be costly to provide services to the 45,000 people who will occupy these spread out residences. With the possibility of solar/wind power systems coupled with hauled water potentially being allowed as the primary water source for future development, the 15,000 homes may come sooner than later.

Our belief is that the tracts of land listed below are within a reasonable proximity to infrastructure, large enough to create a "balanced" use that respects the importance of protecting our environment while accommodating the inevitable growth Antelope Valley is poised to experience in the coming years.

West Lancaster Parcels / Map attached

3263-012-017	135 West & E-8	40 acres
3263-012-099	130 West & E-8	60 acres
3266-005-002	125 West & F-8	40 acres
3263-004-029	120 West & E	40 acres
3263-012-092	120 West & E-8	20 acres
3263-012-093	120 West & E-8	20 acres
3263-012-005	120 West & E-8	40 acres

The above parcels are located 1-2 miles west of the current Lancaster city limits and are void of flood zones. These parcels are also located one - two miles south of the future expanding Highway 138, one mile west of existing 110 west, and are bisected by the future regional artery at 125 West and noted on attached LA County existing and future network of roads. Given the historic link between roads and future development, these parcels may become economically viable to develop and bring additional revenue to LA County. In addition to potential future housing, there have been discussions with potential solar developers to use the land for solar power generation facilities. We do appreciate the counties positive stance of renewable energy being incorporated within future A-2-2 zoning.

East Side Lancaster Parcels / Map Attached:

3145-034-001	39 acres	3608 East Ave E
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The above parcel is located on paved East Ave E and 2500 feet east of 30th East, which is a well traveled thorough fare. The following infrastructure is located on the parcel: power, fiber optics, recycled water, an existing well, is located in LA County waterworks district, is not in a flood zone, and currently is not in an SEA Zone though that may change if the proposed SEA expansion is adopted. The above parcel is currently zoned with a desert zoning which allows for a vast range of uses. This parcel has had interest from developers ranging from farming, greenhouses for specialty organic products, as well as hosting a solar power generation facilities. These potential uses will bring additional revenue to LA County while using very little in terms of services. If the proposed down zoning and SEA zoning is adopted, the above parcel will be limited to one residential unit.

3152-007-025 40 acres

East Side Palmdale Parcels / Map Attached:

3079-002-017/018/019	20 acres
3041-034-012	40 acres
3039-019-002	20 acres
3046-005-023	20 acres

The above parcels are adjacent to or within close proximity to the proposed HDC "High Dessert Corridor." In addition, the above parcels are adjacent to or within close proximity to the proposed North/South expressway at 125 East, south of the HDC as well as the expressway at 120 east, north of the HDC.

If the county's position is to implement the Town and Country Zoning Plan and SEA expansion as proposed, then it is our opinion the county is defacto creating "open space." If the county like many municipalities desires "open space", then either buy land to create the open space like many municipalities do around the country or lower assessed tax values given the down zoning of future use for land.

Sincerely,

Douglas V Marshall, Principal

3263012099

3263012017

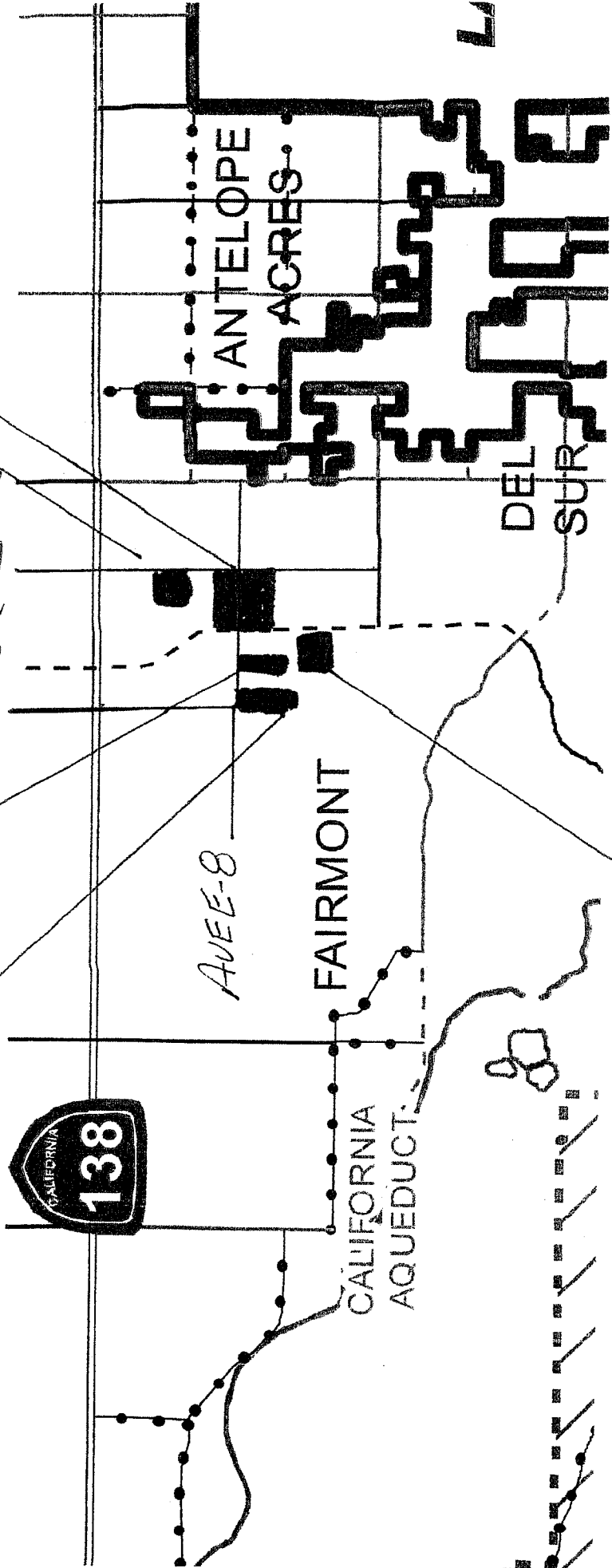
3263004029

3263012092

3263012093

3263012005

135 West
130 West
125 West
120 West
110 West



3264005002

AVE

30 West

3000 East Ave E

3145

034001

3152 007025

REDMAN

ROOSEVELT

IR



120 EAST
↓

P-8

3079002017
3079002018
3079002019

PALMDALE BLVD

SUN
VILLAGE

3041034012

3046005023

AVET

3039019002

LITTILEROCK

125 EAST
↑

Carl Nadela

From: Annie Yu [asyusong@yahoo.com]
Sent: Thursday, October 02, 2014 12:15 PM
To: Carl Nadela
Subject: Re: Second submission of comments on the Proposed Antelope Valley Areawide General Plan Update

Hi Carl,

Thank you again for your patience and dedication to this project.

I would like to make the request to have our parcel APN # 3219007012's zoning and land use designation change to mixed use/MUR. My husband is a physician and we have plan to build a professional office building on the parcel. We believe it's a reasonable use for this parcel which has frontage on 90th West (a major highway) and there are church, school and restaurant close to our lot on the same street (90thWest). And the community will benefit from professional services.

Regards,
Annie Yu
626-390-1333

On Thursday, October 2, 2014 8:27 AM, Carl Nadela <cnadela@planning.lacounty.gov> wrote:

Hi Annie,

Sorry we weren't able to reply to your previous emails. Actually, we were able to incorporate your comments into the Staff Supplemental Package submitted to the RPC at the hearing day. You can access a copy of that document here: http://planning.lacounty.gov/assets/upl/project/tnc_rpc-supplemental-20140927.pdf.

Thanks!

Carl

Carl Vincent Nadela
Community Studies North
Los Angeles County Department of Regional Planning
213-974-6476

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From: Annie Yu [mailto:asyusong@yahoo.com]
Sent: Wednesday, October 01, 2014 10:48 AM
To: Carl Nadela; Susan Tae
Subject: Second submission of comments on the Proposed Antelope Valley Areawide General Plan Update

Dear Mr. Nadela and Ms. Tae,

Not sure if you received my two emails dated 9/25 (timed 10:33 and 11:12 pm) since I have not heard back from you via email nor phone call. I combined the points from those two emails and are sending you the same comments for a second time. I understand you must be busy organizing inputs from the hearing. Hope to hear from you soon!

I had the pleasure of speaking to both of you and thank you for your patience in explaining relevant information on the proposed area plan update.

My husband and I own a parcel APN# 3219007012 which is a 1.25 acre parcel located in the southeast corner of 90th West and F-8. With most of the frontage on 90th West. While we respect and support the preservation of rural feel for the area in Antelope Acres one needs to keep in mind that 90th West is an existing major highway (it is a major thoroughfare that connects the area to Tehachapi and beyond) with established developments of restaurant, market, church, school and high density homes from Avenue E to Avenue I. Also Highway 138 is just to the north of this area.

I would like to request the following:

1. Keeping the Central EOA boundary with the original designation up to 110th street or at least up to 90th West to take into account of the fact the town center is located on the 90th West and it is a major highway where some commercial activities are likely to take place. In addition, given the current disjointed boundary between City of Lancaster and County of Los Angeles, economic development is likely to take place in this general area.
2. In the same line of reasoning, consider making the town center to incorporate avenue E to G instead of E4 to E12 on 90th West. Other town centers in this proposed plan have much larger town center designation. While the residents want to keep the area rural there are still needs for some commercial and professional services to support the economic and employment needs of the community. And keeping the commercial activities on 90th West makes the most sense while keeping the rest of Antelope Acres rural. Or in the alternative, allow land use and zone change to allow for mixed use for parcels with frontage on 90th West from Avenue E to G.
3. If none of the foregoing are granted, we would request to keep existing land use density for our parcel and surrounding parcel to 1 du per 1 acre. There are close to two hundred parcel immediately adjacent to our parcel which are 1.25 acre lots. I believe the proposed change is 1 du per 2.5 acres.

Due to family obligations (kids' basketball games), we will not be able to attend the Saturday's hearing in person. Please feel free to contact me on my cell # 626-390-1333. Please also added me to the email list for future developments.

Mr. Nadela--I understand you are extremely busy getting ready for Saturday's hearing, but at some point I would like to discuss these issues with you over the phone if possible. Please feel free to give me a call or let me know when is a good time to call you.

Respectfully submitted,
Annie Yu

September 30, 2014

To : Mr. Carl Nadela, AICP (fax 213-626-0434)

County of Los Angeles, Department of Regional Planning

From : Jay Lee

Owner : Becon Hill Resort, Inc

dba : Pyramid Lake R.V. Resort

45100 Copco Ave., p.o.box 45, Gorman, CA 93243

Re : Change of Zoning

Dear Mr. Nadela,

I met you and talked with you at "Public Hearing" on last Saturday.

Also I called you and left message to David in your office for you yesterday as you said regarding what is my opinion about the Change of Zoning from C-3 to A 2-2

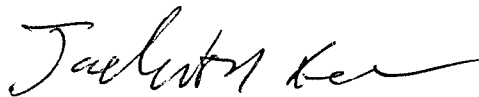
As I told you, I'm doing business(R.V. resort and convenient store) on the my C-3 property. Therefor Don't change the zoning of my property from C3 to A2-2. Please keep the same zoning.

Parcel Numbers are #3250-004-020 and #3250-004-021

I like to hear what is your opinion about my opinion as soon as possible. If you have any questions, please give me a call at 661-248-0100 or fax me to 661-248-0102

Thank in advance for your sincerely helping for this matter.

Sincerely



Jay k. Llee

AMENDED

Russell & Beverly Ewing, Trustees
24327 Welby Way
West Hills, CA 91307
(818) 340-7452
October 2, 2014

Mr. Carl Nadela
Community Studies North, County Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

Re: APN 3083 001-057
175th St. East & Hwy. 138 (Pearblossom Hwy), Llano

Mr. Nadela,

We respectfully request that APN 3083-001-057, located at the corner of 175th East and Highway #138 (Pearblossom Hwy.) per the Antelope Valley East Portion Land Use Policy (Sheet 2 of 3) Map 2.1, be designated back to its "CR" - Rural Commercial designation.

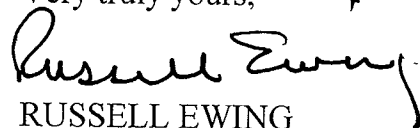
I have attached copies of maps showing that properties both catty-corner to our property (approximately 110 yards southwest) and another property at 165th East and Highway #138 (approximately 1 mile west) have maintained their CR designation. Additionally, the property to the southeast of ours has maintained the "IL" - Light Industrial designation per the proposed plan. We recognize this was more likely an oversight by the Planners while developing the Draft Antelope Valley Area Plan, dated August 2014; however we believe maintaining our property rights to develop this parcel as a "CR" - Rural commercial zone is consistent with the Area Plan's Vision Statement.

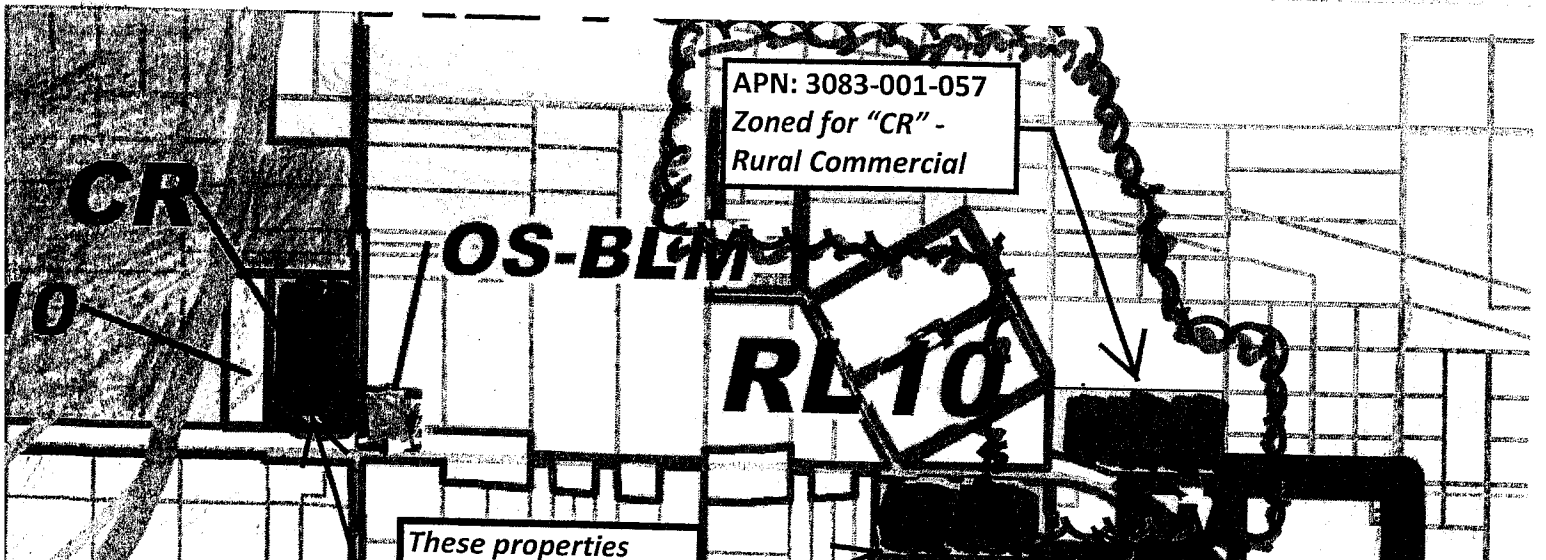
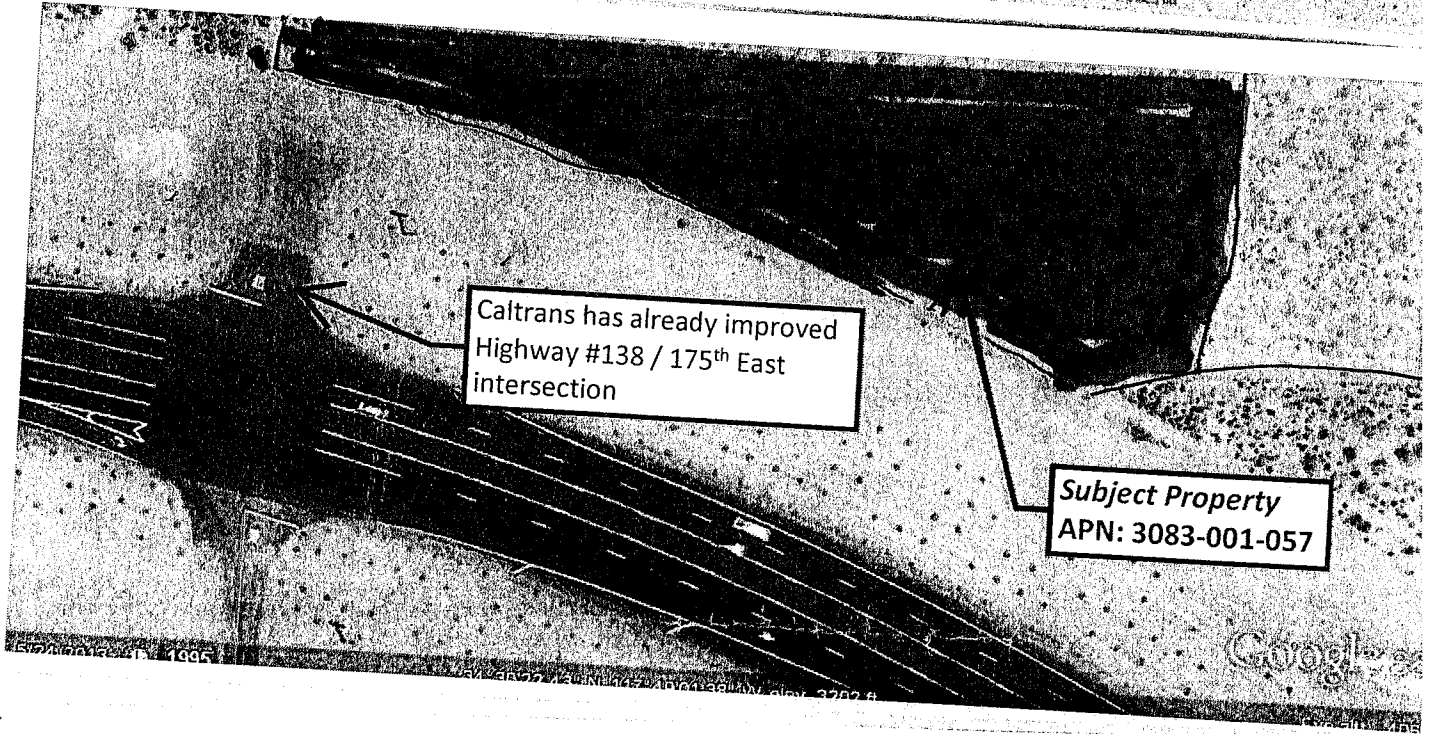
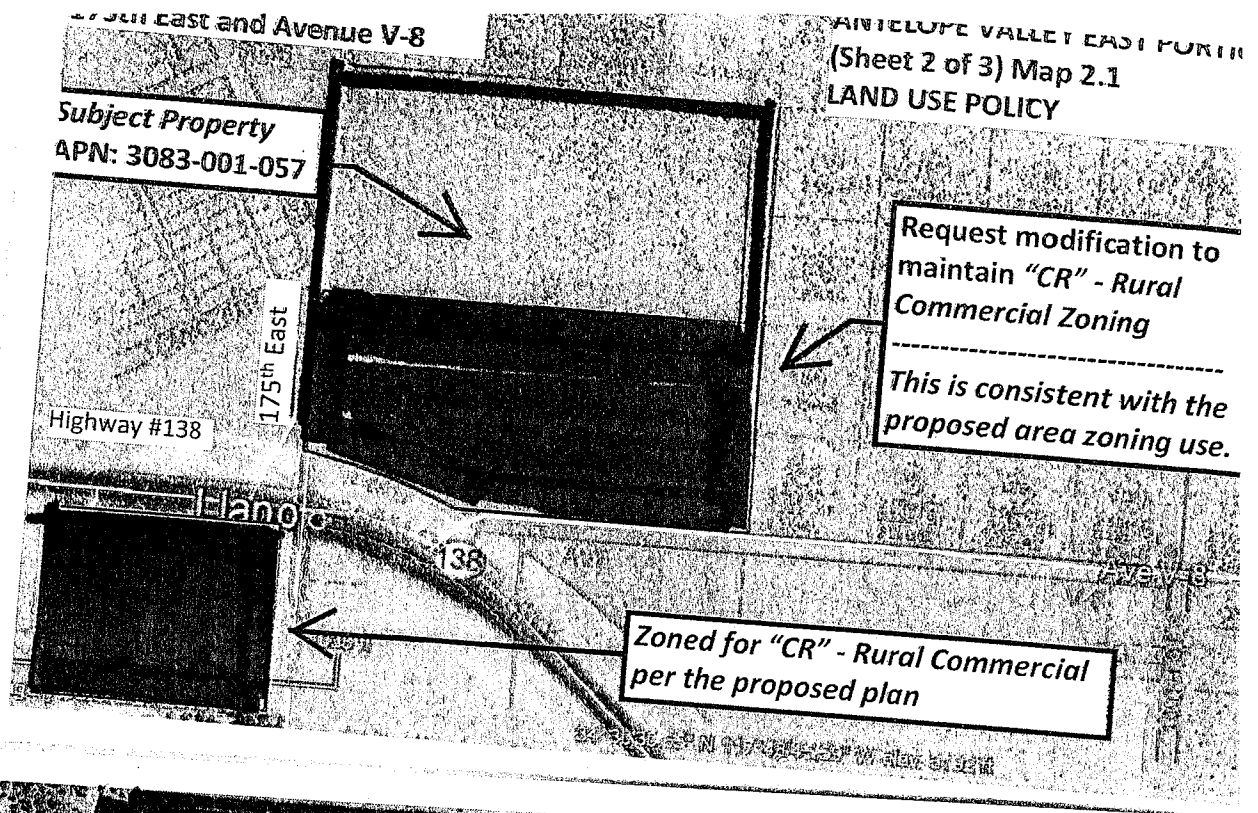
We have owned this property for over 50 years, pay taxes to maintain our right to develop this property with a commercial development value in mind. We believe the restoration of the parcel back to the CR designation will maintain the Planning Commissions Vision and strategy. We agree with the Antelope Valley Area Plan's intent for each town to flow outward from vibrant town centers which offer a range of local-serving activities for day-to-day living. Our request maintains the minimal amount of commercial property which currently exists in Llano.

We believe by maintaining this property's designation the areas residents will not need to travel long distances in their vehicles to obtain basic amenities thereby reducing the Vehicle Miles of Travel (VMT) ratio which is another key strategy for L. A. County and the State of California to reduce traffic congestion.

We appreciate your time and consideration of our request.

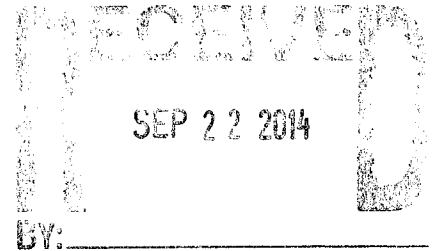
Very truly yours,


RUSSELL EWING



Gary and Janice Gunther
September 17, 2014

County of Los Angeles
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012



Reference: Antelope Valley General Plan Update (Town and Country)
APN 3208-004-021

Gentlemen:

We are the owners of the above-referenced APN 3208-004-021, an approximate 3/4 acre parcel located in Acton, CA. The parcel sits between Antelope Woods and State Route 14, approximately 600' west of Crown Valley Road (the main Acton freeway off ramp) and adjacent to a commercially zoned parcel fronting on Crown Valley Road.

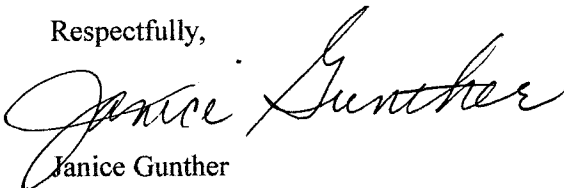
Presently the parcel is zoned A-1 10,000. We respectfully request the parcel be changed to a commercial zoning for the following reasons:

1. To match the adjacent commercially zoned parcel.
2. To facilitate the usability of the land. This location adjacent to the freeway off ramp and commercial property is not practical for non-commercial use.
3. The forthcoming General Plan will guide Acton's development for the next 25+ years.
4. Acton is growing and the populous will need more and more services, requiring more available commercially zoned parcels.
5. The populous is also aging, eventually these residents will require more services closer to home, again the need for more parcels zoned for commercial use.
6. To protect Acton's urban lifestyle, the preferred location for these businesses is near the freeway so that traffic to and from the business is limited to the area near the freeway rather than traveling through the rural community.
7. Just during the time the General Plan update has been underway, this area near the freeway has seen serious interest from businesses proposing to bring services to the community. As these businesses occupy the currently available commercial lots, the inventory of properly zoned lots needs to be replenished to maintain a healthy ratio of lots to demand.

In a recent discussion of this matter with Mr. Carl Nadela of Community Studies North, Dept. of Regional Planning, he indicated that if he were asked for his opinion, he would recommend our lot zoning be changed to commercial.

Thank you for your time and attention in this matter. If you have any questions, please feel free to contact me by phone at 661-433-0824.

Respectfully,


Janice Gunther

Carl Nadela
Antelope Valley Area wide General Plan (AVAP) Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

The Centennial Project is a massive development that will require the county to provide urban level services far from the nearest county service area. Currently, many rural communities have repeatedly asked for Sheriff Services, Fire Stations, Parks and other things that bring communities together. With the exception of one or two communities, none of this has been financially feasible. What has caused the county to decide it can provide urban level services to Centennial when it cannot even provide local sheriffs to the other towns that have asked for this?

How can the county make decisions about Centennial when there has been no environmental impact report? The EIR is what should drive the decision making process. Therefore, I ask that before it is considered an economic opportunity area or other decisions made, that a complete EIR be completed.

Sincerely,

Renato Shindler
9103 W. Ave F
Antelope Acres CA.
93536

Carl Nadela

From: Brenda Avadian [BAvadian@avradionet.com]
Sent: Monday, October 06, 2014 1:13 PM
To: Carl Nadela; DRP Town & Country Project
Cc: Mitch Glaser; NHickling@jacbos.org
Subject: COMMENTS re: Town and Country Antelope Valley Plan

Dear Carl,

Thank YOU again for the opportunity to present at the Town and Country Antelope Valley Plan Hearing on 27 September 2014.

For the record (on your October 6th deadline), please accept four Juniper Hills (JH) Community Members' comments followed by my remarks presented during the September 27 hearing with updates. *These four letters were in response to the summary and highlights I sent to JH Community members prior to and following the Town and County's AV Plan hearing.*

As I noted during the hearing, some of us have been involved in the earlier meetings since 2007, 2009 (with Mitch Glaser) to learn about and help shape the plan which is an update to the 1986 plan.

See below.

Brenda Avadian, MA
President
Juniper Hills Town Council
661-944-1130

4 Community Members' Responses

From: Bruce and Stevie Love [mailto:brucelove9@gmail.com]
Sent: Monday, September 29, 2014 8:38 PM
To: BAvadian@avradionet.com
Subject: Area Plan comments

Dear Brenda and community residents:

Here are comments from Bruce and Stevie Love (thank you Brenda for attending the meeting and arranging your email so we could see the highlights and the places that you recommended needed comments).

Item D: Transfer of Development Rights Program

The rural community of Juniper Hills should not be part of any Transfer of Development Rights (TDR) Program. We are not and should not be designated an Economic Opportunity Area (EOA) because we are only rural and residential and we have no economic development within our boundaries. Therefore we should be excluded from any TDR program.

Item E: Scenic Drives program

We agree in principal with preserving the scenic value along proposed scenic drives, including Juniper Hills, but the three bullet points in Item E refer to proposed development within the viewshed of the scenic drive. In Juniper Hills, as outlined in our CSD, there can be no development, so these points of the Scenic Drives program are moot.

Item F: Community Standards Districts

The Area Plan is considering a program to "adopt any proposed . . . amendments to existing CSDs . . ." At the present time, Juniper Hills has no intention of amending its CSD. If the new Area Plan includes a program to adopt amendments to existing CSDs, it should be clear that the only amendments that can be considered are those that are instigated by the community itself, not amendments proposed by the County or any outside entity.

In addition to these specific comments, we also agree in general and in principle with Brenda Avadian's comment that there is not enough water to support development in the AV.

Submitted by

Bruce Love and Stevie Love
29709 104th St. E.
Juniper Hills, CA 93543

From: Debbie Phillips, VP JH Town Council [mailto:dlphillips007@gmail.com]

Sent: Tuesday, September 30, 2014 6:59 PM

To: Avadian Brenda

Subject: Re: [juniperhillscommunity] Need your reply before posting ...

Brenda,

It seems that they want to do is establish zoning that would allow the development of businesses along the major highway corridors. I don't think they are referring to residential property owners but I might be wrong on this very important fact.

Nothing could be built without L.A. County Planning or local city approval. No one would be permitted to build without a water source, regardless of the zoning. But the major fact is that any construction would further deplete the amount of water available and we DO NOT WANT THAT.

Their vague reference to changes to Community Standards Districts is alarming. I don't know how that could happen without the approval of those in the district (our residents). And I don't know understand what "transfer of rights" really means.

Debbie

FROM: Cathy and Rick Conrad [mailto:cathyc70@hotmail.com]

Sent: Tuesday, September 30, 2014 8:18 AM

To: Brenda Avadian

Subject: Juniper Hills

Good morning Brenda, Sorry to get back to you so late. ... Our input is, we all moved up here for the peace & quite that a rural area gives us. If we allow our zonings to be changed to A2 or A5 it would bring in the noise from heavy equipment, dirt from grading & most of our roads are dirt, heavy equipment would destroy them , & as you say WHERE IS THE WATER. Keep all the business in the towns that want it, Not the rural areas. About the Scenic dr. , Any one that walks our roads knows all about the trash & cigarette butts from our guest to the Punch Bowl now, multiply that by 10, especially the scary cigarette butts. I agree with the two Men from L.R. about the solar panels. Look at any solar field & you will see how poorly kept they are. I guess in closing I have to say, Why can't L.A. County just leave us to our quiet little rural selves?

Good luck Brenda
Rick & Cathy

FROM: Les Hurdle [mailto:LH101@avradionet.com]

Sent: Saturday, September 27, 2014 10:14 PM

To: juniperhillscommunity

Cc: BAvadian@avradionet.com Avadian

Subject: Re: [juniperhillscommunity] Need your reply before posting ...

Perhaps our planning reps should come from this part of the world, not the concrete jungle and from the support of cushy salaried jobs.

Agreed, where do they plan to get the water?

L H

I submit the following for the record—an edited and updated version of the presentation I made at the September 27 Hearing and sent to the Juniper Hills community. I added feedback to the follow-up 4-page document and 1.2GB video sent after the Hearing. *Incidentally, it took a half day to download!* Brenda Avadian, MA 661-944-1130

RE: Town and Country Antelope Valley Plan Hearing Saturday morning, September 27, 2014 with UPDATES 10/6/2014

Following your (Carl Nadela) 20-minute overview of the Town and Country Plan objectives and predictions (e.g., sizable population growth by about 15,000 families and growth of 1 job for every 3 households by 2040 vs. the 1 to 5 we have today, the hearing opened to comments from TC representatives and other officials.

I spoke fourth. Although I serve as the president of the JH Town Council, council members have not had the opportunity to discuss the issues at a recent meeting, so these views are mine:

We've been with you since the beginning and responding to your meetings, or as you call it, Carl, your road shows. This has been a massive undertaking. Thank YOU for taking this on and helping us look to the future.

I will share one overarching concern then two additional issues. Unfortunately, we received notification of this meeting too late. I know Carl, you have updating us for the past several months, but late notification prevented us from getting greater participation by residents of Juniper Hills. I turn to the audience now to ask, by a show of hands, who is here from Juniper Hills?

The entire theatre was filled to capacity and standing-room-only folks were in the lobby watching the monitors and listening. I arrived right as they began and took a seat in the second row and then spotted Norm Hickling in the third row.

One man seated 15 rows back raised his hand and then my husband did. That was it--three people, including me, from Juniper Hills who identified themselves.

Now for my issues:

1. With all the development planned for the Antelope Valley—15,000 families, industrial, and jobs, I ask you the one question I have asked consistently throughout all these planned-growth initiatives—

Where's the water?

I paused to initial silence and then the first applause of the hearing.

All this planned development while we're having a water adjudication will raise costs for residents already struggling to pay their bills.

2. In the most recent document (Chapter 8- Plan Implementation http://planning.lacounty.gov/assets/upl/project/tnc_ch_08_plan-implementation-20140822.pdf), you address revising the CSDs (Community Standards Districts). This, and the (Item D) Transfer of Development Rights Program are important issues addressed in several of the letters received in http://planning.lacounty.gov/assets/upl/project/tnc_rpc-memo-20140918.pdf e.g., see pages 35-38) and can't be relegated to the end of a document. I ask that you bring them front and center as they are important.

Thank you for giving me the opportunity to express my views. *More applause.*

On a related note to item 2 (and note and not presented at the hearing): the proposed shopping and residential development in the northwestern area of the Antelope Valley bordering along Kern County will divert the precious resources of our valley and raise the costs for everyone... all for a short-sighted goal of raising tax revenue.

Instead, let's conserve not only our water but our government spending as well. Just because a program has been created does not mean it needs to remain viable *just because*. Everything, including life has a cycle and an expiration date.

Also, not presented at hearing but my follow-up comments:

The follow-up 4-page revised pdf document posted to the planning department's website following the hearing September 27th. [View it here](http://planning.lacounty.gov/assets/upl/project/tnc_rpc-summary-20140927.pdf) [http://planning.lacounty.gov/assets/upl/project/tnc_rpc-summary-20140927.pdf]

I feel a bit unnerved by item 10, which appears to cater to special interests when we're addressing a "valley-wide" plan. I'm open to greater understanding through transparency.

People spoke from the Blue Ribbon Committee and from the Business and Industry groups—mostly positive about the prospects for growth in our valley. *Where's the water?*

Within the last 10 minutes of the hearing (as viewed on video—I was not there), selected SEAs were eliminated. It seemed kind of fishy to me to view this on the video but I don't know enough to comment. For example, as my husband, David, and I were leaving he drew my attention to one of the maps (proposed) of A-2 to A-5 (Heavy agricultural) for our area. This had escaped my attention, earlier... even after a resident asked about it in an email. Our CSD is for RL-5. I asked Vance Pomeroy about this and he illuminated the difference between "zoning" (A-2 through A-5) and "planning" as part of our CSDs at RL-5.

We do need a plan, because we're no longer the wild west. And we need a plan that doesn't cater to special interests, who near-sightedly carve out scarce resources for short-term gains.

Brenda Avadian, MA
President
Juniper Hills Town Council
661-944-1130

AGUA DULCE TOWN COUNCIL

33201 Agua Dulce Canyon Road * Box Number 8 * Agua Dulce, CA 91390

Website: www.adtowncouncil.com

October 1, 2014

Mr. Carl Nadela, AICP
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

Via Email to: tnc@planning.lacounty.gov

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Comments

Dear Mr. Nadela:

The Agua Dulce Town Council appreciates the opportunity to comment on the Antelope Valley Area Plan Update Draft Environmental Impact Report released on August 22, 2014.

The Agua Dulce Town Council is a local entity representing approximately 5,000 residents in the unincorporated community of Agua Dulce in northern Los Angeles County. Our community is semi-rural and includes a town center and small family-owned ranches and homesteads located within the Santa Clarita Valley Area Plan boundaries.

The Council has reviewed the Draft Environmental Impact Report relative only to the boundary. The proposed updated Antelope Valley Area Plan project directly impacts a small portion of the community of Agua Dulce.

- **The Community of Agua Dulce falls within the Santa Clarita Valley Area Plan, One Valley One Vision:** The Agua Dulce Town Council and community members of the Agua Dulce area participated in, commented on, and contributed to the multi-year update process of the Santa Clarita Valley Area Plan that was formally adopted on November 27, 2012. The boundary of the eastern section did not change from the original boundary established.
- **The Boundary of the Proposed Antelope Valley Area Plan Update extends outside of the existing boundary:** The proposed south western boundary just south of State Route 14 extends outside of the existing Antelope Valley Area Plan into the existing adopted Santa Clarita Valley Area Plan.
- **The Agua Dulce Town Council opposes any change to the boundary of the Proposed Antelope Valley Plan Update that extends into the adopted Santa Clarita Valley Area Plan:** The Agua Dulce Town Council and community members have been assured by Supervisor Antonovich and his staff that the boundary of the Santa Clarita Valley Area Plan would not be altered.

- Don Henry, President
(661) 268-1731
BH33605@aol.com
- Mary Johnson, Secretary
(661) 268-8804
maryjohnson767@gmail.com
- Troy Fosberg, Treasurer
(818) 854-0031
damage22@gmail.com
- Steve Cummings, Clerk
(661) 433-3234
hasaranch1@yahoo.com
- Scott Keller, Member
(661) 317-5355
scottwilliamkeller@aol.com
- Ed Porter, Member
(661) 992-3692
porteredward@msn.com
- Lou Vince, Member
(310) 597-7154
Lou@LouVince.com

We request Regional Planning Staff and the Regional Planning Commission to honor the existing boundary of the Santa Clarita Valley Area Plan and to move the proposed boundary of the proposed Antelope Valley Area Plan Update back to the existing boundary without extending any further.

We ask that our comments and those of our constituents be given serious consideration. We appreciate the opportunity to present our concerns and hope those concerns are kept in mind during the preparation of the Final Environmental Impact Report. If any of our comments need clarification or further explanation, please do not hesitate to contact us.

Sincerely,

Don Henry

Don Henry, President
Agua Dulce Town Council – 2014

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacbos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacbos.org

Mr. & Mrs. Mike Terry
7881 Escondido Canyon Road
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm writing to you to let you know we are opposed to the proposed boundary change of my property to the Antelope Valley Area Plan Update. My property 7881 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Over the years, I inquired with Regional Planning whether my property was in the Antelope Valley Area Plan or Santa Clarita Area Plan. I was assured by Regional planning it was indeed within the boundary of the Santa Clarita Valley Area Plan Update. I have gone through the update process with the Santa Clarita Valley Area Plan Update, and have informed Regional Planning staff my desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. I realize the significant impact of a zoning change to AV Area Plan my property may be subject to if moved to AV Area Plan. It is our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update

This week, my neighbors informed me, my property and all properties in this area are in consideration to be moved to the Antelope Valley Area Plan, you can imagine my surprise when I was informed of the "Notice of Public Hearing and Availability of EIR". I can't say I ever received the notice. After my conversation with my neighbors, I went on-line to check whether my property would be affected, and found 7881 Escondido Canyon Road, would be indeed affected.

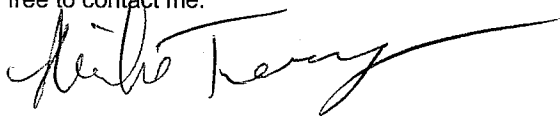
The GIS mapping feature is difficult to understand, but as I view my property outline, the pop-up box indicates my property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want the zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

After reviewing the pros and cons of the Santa Clarita Valley Area Plan – vs- Antelope Valley Area Plan, I realize the significant impact of a zoning change that my property may be subject to.

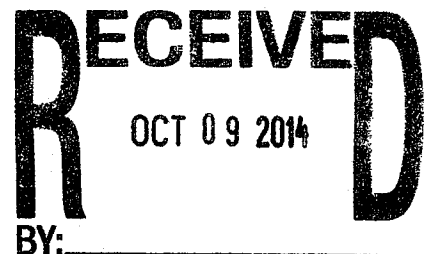
Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to our wishes by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact me.

Sincerely,



Mike Terry
(661) 268 - 1650



Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacobos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacobos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Anthony Ramirez [anthonyramirez3d@gmail.com]

Sent: Sunday, October 05, 2014 8:09 PM

To: DRP Town & Country Project

Cc: rwayman@lacos.org; evizcarra@lacos.org; bh33605@aol.com; Mary Johnson [maryjohnson767@gmail.com]

Ubaldo and Carmen
33721 Hubbard Road
Acton, CA 93510

October 05, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 33721 Hubbard Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, I have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine my surprise when we received a "Notice of Public Hearing and Availability of EIR" form letter and then went on line to see whether our property would be affected, and found our property address and vacant undeveloped lot are indeed affected.

We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, I realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,

Ubaldo & Carmen Ramirez
(661) 268 - 1872

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Boundary Issue

Scott Keller [scottwilliamkeller@aol.com]

Sent: Sunday, October 05, 2014 10:27 AM**To:** DRP Town & Country Project

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela,

We like to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 8023 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

The GIS mapping feature is confusing, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbours and us by leaving our area within the Santa Clarita Valley Area Plan.

Sincerely,

Scott & Dominique Keller
661-3175355

c.c. Ms. Rosalind Wayman, 5th District Deputy rwayman@lacbos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacbos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Scott Keller
scottwilliamkeller@aol.com

Mr. Robert Standish/Mrs. Joyce Convis
6603 Ranchitos Drive
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

This letter is to inform you we are opposed to the proposed boundary change of our property to the Antelope Valley Area Plan Update. Our property located at 6603 Ranchitos Drive, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Just this week, our neighbor informed me, our property and all properties in this area are in consideration to be moved to the Antelope Valley Area Plan, I was very surprise to hear this information a "Notice of Public Hearing and Availability of EIR". I can't say if we ever received such notice. I went on- line to check whether our property would be affected, and found 6603 Ranchitos Drive, was indeed affected.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. We were assured by Regional planning it was indeed within the boundary of the Santa Clarita Valley Area Plan Update.

The GIS mapping feature is difficult to understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We realize the significant impact of a zoning change to AV Area Plan our property may be subject to. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to our wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact me.

Sincerely,

Mr. Robert Standish/ Mrs. Joyce Convis
(661) 268-7477

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacobos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacobos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Michael and Mercedes Tuccillo
33320 Kingbird Way
Acton, CA 93510

October 4, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

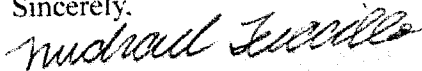
I'm contacting you to let you know that we are opposed to any proposed boundary change in the Antelope Valley Area Plan Update that would remove our property, 33320 Kingbird Way, from the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,



Michael Tuccillo

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Jean and Don Laird
7050 Ranchitos
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

This letter is to inform you we are opposed to the proposed boundary change of our property to the Antelope Valley Area Plan Update. Our property located at 7050 Ranchitos is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Just this week, our neighbor informed me, our property and all properties in this area are in consideration to be moved to the Antelope Valley Area Plan, I was very surprise to hear this information a "Notice of Public Hearing and Availability of EIR". I can't say if we ever received such notice. I went on-line to check whether our property would be affected, and found 7050 Ranchitos, was indeed affected.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. We were assured by Regional planning it was indeed within the boundary of the Santa Clarita Valley Area Plan Update.

The GIS mapping feature is difficult to understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We realize the significant impact of a zoning change to AV Area Plan our property may be subject to. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to our wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact me.

Sincerely,

Jean and Don Laird
661-400-1958

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacobos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacobos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Michael and Noelle Tuccillo
8246 Escondido Cyn Rd
Acton, CA 93510

October 4, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm contacting you to let you know that we are opposed to any proposed boundary change in the Antelope Valley Area Plan Update that would remove our property, 8246 Escondido Cyn Rd, from the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,



Michael Tuccillo

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacbos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacbos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Dan and Theresa Smith
33360 Kingbird Way
Acton, CA 93510

October 4, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

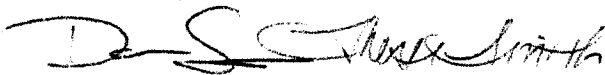
I'm contacting you to let you know that we are opposed to any proposed boundary change in the Antelope Valley Area Plan Update that would remove our property, 33360 Kingbird Way, from the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,



Dan and Theresa Smith
661.480.8847

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Enrique and Nancy Alejo
8144 Escondido Canyon Road
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

This letter is to inform you we are opposed to the proposed boundary change of our property to the Antelope Valley Area Plan Update. Our property located at 8144 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Just this week, our neighbor informed me, our property and all properties in this area are in consideration to be moved to the Antelope Valley Area Plan, I was very surprise to hear this information a "Notice of Public Hearing and Availability of EIR". I can't say if we ever received such notice. I went on-line to check whether our property would be affected, and found 8144 Escondido Canyon Road, was indeed affected.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. We were assured by Regional planning it was indeed within the boundary of the Santa Clarita Valley Area Plan Update.

The GIS mapping feature is difficult to understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We realize the significant impact of a zoning change to AV Area Plan our property may be subject to. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to our wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact me.

Sincerely,


Enrique (EJ) Alejo

(213) 952 - 8900

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Eduardo (Eddie) Alvigures
7605 Escondido Canyon Road
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm writing to you to let you know I am opposed to the proposed boundary change of my property to the Antelope Valley Area Plan Update. My property at 7605 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Prior to purchasing my property I inquired whether it was in the Antelope Valley Area Plan or Santa Clarita Area Plan. I was assured by Regional planning my property was indeed within the boundary of the Santa Clarita Valley Area Plan Update. It is my desire to remain within the boundary of the Santa Clarita Valley Area Plan Update.

This week, my neighbors informed me, my property and our area was in consideration to be moved to the Antelope Valley Area Plan, you can imagine my surprise when I was informed of the "Notice of Public Hearing and Availability of EIR". I can't say I ever received the notice. After my conversation with my neighbors, I went on-line to check whether my property would be affected, and found my property 7605 Escondido Canyon Road, would be indeed affected.

The GIS mapping feature is difficult to understand, but as I view my property outline, the pop-up box indicates my property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across my property boundary. I DO NOT want my zoning changed. I DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

After reviewing the pros and cons of the Santa Clarita Valley Area Plan – vs- Antelope Valley Area Plan, I realize the significant impact of a zoning change that my property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to my wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact me.

Sincerely,



Eddie Alvigures
(818) 448 - 5444

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Gael Parks & Julia Wolfe
33424 Hubbard Road
Acton, CA 93510

October 04, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change of our property to the Antelope Valley Area Plan Update. Our property located at 33424 Hubbard Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. We were assured by Regional planning it was indeed within the boundary of the Santa Clarita Valley Area Plan Update. We have participated in and attended many of the meetings held over the years for the Santa Clarita Valley Area Plan. We realize the significant impact of a zoning change to AV Area Plan our property may be subject to.

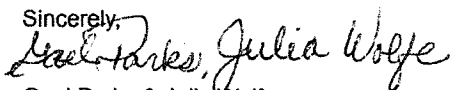
This week, our neighbor informed us, our property and all properties in this area are in consideration to be moved to the Antelope Valley Area Plan, we were very surprise with this information "Notice of Public Hearing and Availability of EIR". We can't say if we ever received the notice. We went on-line to check whether our property would be affected, and found 33424 Hubbard Road, would be indeed affected.

The GIS mapping feature is difficult to understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to our wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Please feel free to contact us.

Sincerely,



Gael Parks & Julia Wolfe
(818) 317 - 0335

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Eric Myers [myers@antelecom.net]

Sent: Thursday, October 02, 2014 9:44 PM

To: DRP Town & Country Project

Cc: rwayman@lacos.org; evizcarra@lacos.org; bh33605@aol.com; maryjohnson767@gmail.com

*Eric and Sukwan Myers
33334 Hubbard Road
Acton, CA 93510*

October 2, 2014

*Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012*

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela,

We like to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 33343 Hubbard Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

The GIS mapping feature is confusing, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbours and us by leaving our area within the Santa Clarita Valley Area Plan.

Sincerely,

*Eric & Sukwan Myers
661-268-0762*

*c.c. Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com*

Steven Kessler & Michael Sutherland
33808 Norcross Drive
Acton, CA 93510

October 01, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 33808 Norcross Drive, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, we have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine our surprise when we received a "Notice of Public Hearing and Availability of EIR" form letter and then went on line to see whether our property would be affected, and found our property address was indeed affected.

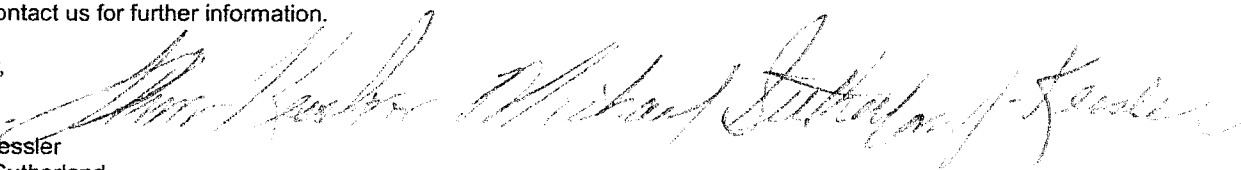
The GIS mapping feature is hard to really understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, we realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact us for further information.

Sincerely,


Steven Kessler
Michael Sutherland
(661) 268 - 0413

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Elfego H. Escobar
7634 Escondido Canyon Road
Acton, CA 93510

October 01, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm writing to you to let you know I am opposed to the proposed boundary change of my property to the Antelope Valley Area Plan Update. Recently I purchased my property at 7634 Escondido Canyon Road, currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012.

I purchased my property after inquiring whether it was in the Antelope Valley Area Plan or Santa Clarita Area Plan. I was assured by Regional planning my property was indeed within the boundary of the Santa Clarita Valley Area Plan Update. It is my desire to remain within the boundary of the Santa Clarita Valley Area Plan Update.

Just last week, my neighbors informed me, my property was in consideration to be moved to the Antelope Valley Area Plan, you can imagine my surprise when I was informed of the "Notice of Public Hearing and Availability of EIR". Immediately I went on line to check whether my property would be affected, and found my property 7634 Escondido Canyon Road, was indeed affected.

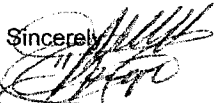
The GIS mapping feature is hard to understand, but as I view my property outline, the pop-up box indicates my property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across my property boundary. I DO NOT want my zoning changed. I DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

After reviewing the pros and cons of the Santa Clarita Valley Area Plan – vs- Antelope Valley Area Plan, I realize the significant impact of a zoning change that my property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to my wishes and our neighbors by leaving this area within the Santa Clarita Valley Area Plan.

Feel free to contact me.

Sincerely,



Elfego H. Escobar
(310) 402 - 7632

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacobos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacobos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Frank and Rosie Heffley
7520 Escondido Canyon Road
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 7520 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, I have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine my surprise when we received a "Notice of Public Hearing and Availability of EIR" postcard and then went on line to see whether our property would be affected, and found our property address and vacant undeveloped lot are indeed affected.

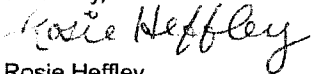
The GIS mapping feature is hard to really understand, but as I view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, I realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,



Rosie Heffley
(661) 268 - 0357

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Scott and Dominique Keller
8023 Escondido Canyon Road
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 8023 Escondido Canyon Road is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, we have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine our surprise when we received a "Notice of Public Hearing and Availability of EIR" postcard and then went on line to see whether our property would be affected, and found our property address was indeed affected.

The GIS mapping feature is hard to really understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, we realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact us for further information.

Sincerely,

Scott and Dominique Keller
(661) 802 - 1894

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacbos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacbos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Tim M. Jorgensen
33307 Hubbard Rd
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

I'm contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 33307 Hubbard Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. I participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, I have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine my surprise when we received a "Notice of Public Hearing and Availability of EIR" form letter and then went on line to see whether our property would be affected, and found our property address and vacant undeveloped lot are indeed affected.

The GIS mapping feature is hard to really understand, but as I view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. I DO NOT want our zoning changed. I DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, I realize the significant impacts of a zoning change that my property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact me for further information.

Sincerely,

Tim M. Jorgensen
(661) 268-1352

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacobos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacobos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Jess and Judy Spencer
33210 Hubbard Road
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 33210 Hubbard Road is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, we have been in regular contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. We were told that it was a done deal. You can imagine our surprise when we received a "Notice of Public Hearing and Availability of EIR" form letter, and we went to research on line to see whether our property would be affected, and found our property 33210 Hubbard Road was indeed affected.


The GIS mapping feature is very hard to understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, we realize the significant impact of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

You may contact us if needed.

Sincerely,


Jess and Judy Spencer
(661) 268 - 0584

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

James and Rebecca Lawson
7767 Escondido Canyon Road
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP inc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 7767 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine our surprise when we received a "Notice of Public Hearing and Availability of EIR" letter and then went on line to see whether our property would be affected, and found our property address was indeed affected.

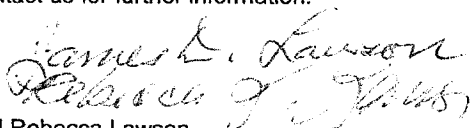
The GIS mapping feature is hard to really understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, we realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact us for further information.

Sincerely,



James and Rebecca Lawson
(661) 268 - 1945

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacbos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacbos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Miguel and Ramon Padilla
7817 Escondido Canyon Road
Acton, CA 93510

September 30, 2014

Mr. Carl Nadela, AICP tnc@planning.lacounty.gov
Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

RE: Antelope Valley Area Plan Update Draft Environmental Impact Report (DEIR) Boundary Issue

Dear Mr. Nadela:

We are contacting you to let you know we are opposed to the proposed boundary change in the Antelope Valley Area Plan Update. Our property at 7817 Escondido Canyon Road, is currently located within the Santa Clarita Valley Area Plan adopted by the Board of Supervisors November 27, 2012. We participated in and attended many of the meetings held over many years for the Santa Clarita Valley Area Plan Update.

Over the years, we have been in contact with Regional Planning staff letting them know our desire to remain within the boundary of the Santa Clarita Valley Area Plan Update. So you can imagine our surprise when we received a "Notice of Public Hearing and Availability of EIR" letter and then went on line to see whether our property would be affected, and found our property address was indeed affected.


The GIS mapping feature is hard to really understand, but as we view our property outline, the pop-up box indicates our property is changing from A-1-2 to A-2-2. But "Santa Clarita Valley" is shown clearly directly across our property boundary. We DO NOT want our zoning changed. We DO NOT want to be moved from the Santa Clarita Valley Area to the Antelope Valley Area.

Having already gone through the update process with the Santa Clarita Valley Area Plan Update, we realize the significant impacts of a zoning change that our property may be subject to.

Do not extend the existing boundary of the proposed Antelope Valley Area Plan Update to encroach into the boundary of the Santa Clarita Valley Area Plan. Please adhere to the wishes of our neighbors and us by leaving our area within the Santa Clarita Valley Area Plan.

Please contact us for further information.

Sincerely,


Ramon & Miguel Padilla and Family
(818) 424 -4977

Cc: Ms. Rosalind Wayman, 5th District Deputy rwayman@lacos.org
Mr. Edel Viscarra, 5th District Land Use Deputy evizcarra@lacos.org
Mr. Don Henry, Agua Dulce Town Council President bh33605@aol.com
Ms. Mary Johnson, Agua Dulce Town Council Secretary maryjohnson767@gmail.com

Mr. Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1354
Los Angeles, CA 90012

September 27th, 2014 In regards to the proposal of Tejon Ranch's *Centennial project*:

The overall question that should be answered first is Do we really need this project to be developed? What particular needs of the County, the State, the Country does this serve?

There is nothing to indicate that this particular type of project needs to be built in this rural area. The only "justification" for this location choice is that a company wants to "develop" the land for profit.

There is a large swath of still relatively natural land from the Sierras to the Coast. Centennial's lands are right in it, like a log across a stream, cutting off the movement of native plants and animals in both directions. Given that California is home to many unique examples of all wildlife makes it even more pressing that we should, ... that we must... help to protect that river of wildlife, the only such strip of land in California.

Taking untouched land and turning it into a mini city is far more costly than attaching it on to area that has basic public services. as well as having more negative impacts on the natural land. And who will be paying the costs? Some, if not all, will fall on the taxpaying citizen.

No matter what ways the builders propose or are ordered to do so as relates to saving water, reducing more pollution to the air, and so on, the fact remains the activity on this site is going to add more than considerably to more air pollution, taking water away from farmers, and putting more pressure on tax related community services such as building services for water and energy, deliver health care and education. .
Specifics:

There is going to be considerably more traffic on the roads. That means increasing the highways in size and number. Increased accidents, noise and pollution from the cars are undesirable impacts and very difficult to mitigate.

This area is subject to big dust storms. That fact relates to the likely increased number of valley fever patients in the area. There are no real mitigation measures available to overcome the effects of this part of the environment.

There is reference to looking for other governmental funds to pay for the city services. Other governmental funds should NOT be the source of funds. If this development is approved all necessary funds should be paid for by the developer, not by the taxpayers ..

What are the predictions of prices of the housing elements? Would the garbage collector and the street cleaners be able to afford to live in this project? or will this be another project for the privileged?

This is truly earthquake country. Should such another massive collection of structures knowingly be allowed to build in this area?

FINALLY: Centennial is a prime example of the development of sprawl defined as the uncontrolled spread of urban development into neighboring regions. It is a seed that may well germinate and destroy the natural world while adding still more air pollution, very reduced water supplies to all, more taxes to pay for new and widened roads, and on and on.

There is no overwhelming need at all for such a development in this particular area.

There is a great need to protect the natural world,

My response to this proposed development is it should not be allowed

Sincerely yours

Mary Ann Lockhart

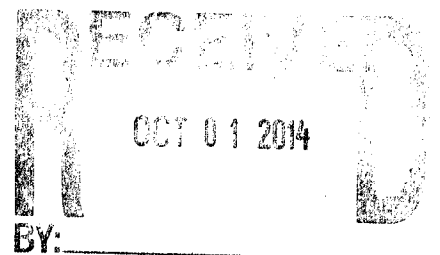
Mary Ann Lockhart

PO Box GG

Frazier Park, CA

The above opinions are mine, not representing any particular group

September 27, 2014.



Carl Nadela
Antelope Valley Area wide General Plan (AVAP) Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

I am in support of the expanded SEA map. It shows a vision of conservation that will be appreciated by generations to come. One of the problems facing the Santa Monica Mountains Conservancy is the lack of connectivity for animals to roam and find food. The expanded SEAs in the Antelope Valley Area Plan are a step in the right direction. Without habitat, nothing can survive. People and nature can live together.

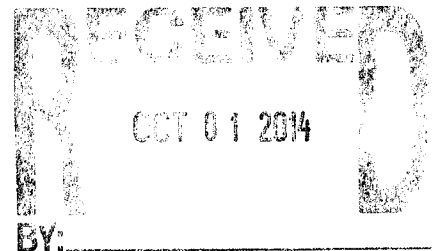
Industrial solar in the Antelope Valley is being done in a way that is very destructive to a rural preservation strategy. Renewable energy should be in an industrial zone. If not, why not? And only treated water from the local tertiary treatment plant or water from outside the Antelope Valley must be used for all renewable energy projects.

In the future, each renewable energy project must have a bond that covers the cost for decommissioning and the complete restoration of the area posted up front before building begins. .

Mitigation land must be matched off-site, no less than acre for acre, within the Antelope Valley. If you cannot do these things, please tell me why.

Sincerely,

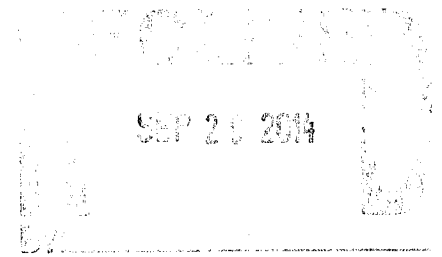
Bill Kelly



7321 W. Ave. 5

Lancaster Ca 93536-8618

Carl Nadela
Antelope Valley Area wide General Plan (AVAP) Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012



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Sincerely,

46330 7257. west
Antelope Acres,
Ca. 93536

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



September 27, 2014

VIA ELECTRONIC MAIL

Carl Nadela, AICP
Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012
Email: tnc@planning.lacounty.gov

RE: July 23, 2014 Updates to Antelope Valley Area Plan (AVAP)

Dear Mr. Nadela:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these revisions to the AVAP and the new Chapter 8, Plan Implementation.

Land Use Element

The revisions to the Land Use Element add major Economic Opportunity Areas (EOAs) that are acknowledged to the result of growth-inducing new highways—the High Desert Corridor and the Northwest 138 Corridor Improvement Project. These EOAs are in addition to *previously* intensified housing and employment locations within Towns and Town Centers—which were intended to be balanced by Rural Preserves. With an aggressive new Economic Development Element that seeks to boost high tech and other jobs, the dye could be cast for major urbanization within currently rural areas.

If the General Plan's rural, agricultural, biological, and open space preservation policies are going to withstand this new direction, then it is essential that growth be highly focused and that there be active policies and programs to achieve open space goals and to implement the Rural Preserve strategy. Otherwise, the outcome will be the continuous sprawl that characterizes neighboring counties and the resultant loss of community separation and greenbelts.

How can a balance be achieved? Previous comments have noted the need for growth control policies between the West and Central EOAs, the role of very low densities in rural designations, the need to expand the SEAs, the use of planning tools to achieve conservation oriented site design, and other factors. Our current comments will address these and other facets of the solution.

Densities

EHL strongly objects to the removal of the RL40 category. Such removal is contrary to oft-stated goals in the plan for open space and biological preservation and fire safety. As we have pointed out in previous correspondence, a scientific literature review shows that adverse edge effects upon biological resources become pronounced beginning at a density of 1:40 then become progressively worse. Why is the Antelope Valley different from the rest of the County, in which RL40 is retained? Outside of EOAs, the default designation for SEAs, other biologically valuable lands, and High Fire Hazard Severity Zones, should be RL40, absent a predominance of existing smaller parcelization. This is a feasible mitigation measure to reduce biological impacts.

Lot sizes

LU 1.34: Maintain the majority of the unincorporated Antelope Valley as Rural Land, allowing for agriculture, equestrian and animal-keeping uses, and single-family homes on large lots.

Policy LU 1.34 perpetuates land-consumptive, inefficient, low density, highly impactful, automobile dependent low density suburbia. It destroys biological resources and scenic open space, is difficult to defend during wildfires, maximizes GHG emissions, and costs the taxpayer for infrastructure and services.

Rather, in Rural designations outside of EOAs, the County should allow ½-acre minimum lot sizes “by right,” as in vast areas of rural Riverside County,¹ so as to permit consolidation of development along with permanent open space and increased fire safety. The amount of vegetation clearance to produce defensible space around dispersed estate lots is staggering. Smaller lots should not depend upon the Planned Unit Development layer of permitting. Absent flexibility for lot sizes, SEAs implementation will be thwarted. Rural Preserves will become low density suburbs, and landowners will have

¹ See Riverside County Land Use Element

<http://planning.rctlma.org/Portals/0/genplan/general_plan_2013/1%20General%20Plan/Chapter%203-Land%20Use%20Element%20Adopted-Final%20Clean.pdf>, Table LU 4 on page LU-47: “Clustering is encouraged in all residential designations. The allowable density of a particular land use designation may be clustered in one portion of the site in smaller lots, as long as the ratio of dwelling units/area remains within the allowable density range associated with the designation. The rest of the site would then be preserved as open space or a use compatible with open space (e.g., agriculture, pasture or wildlife habitat). *Within the Rural Foundation Component and Rural Designation of the Open Space Foundation Component, the allowable density may be clustered as long as no lot is smaller than 1/2 acre. This 1/2 acre minimum lot size also applies to the Rural Community Development Foundation Component.* However, for sites adjacent to Community Development Foundation Component areas, 10,000 square foot minimum lots are allowed. The clustered areas would be a mix of 10,000 and 1/2 acre lots. In such cases, larger lots or open space would be required near the project boundary with Rural Community and Rural Foundation Component areas.” (Emphasis added.)

difficulty obtaining planned unit yield. An essential accompaniment for relatively smaller lots are rural design guidelines. Please note that the “pie-shaped” lots anticipated by COS 19.3 are not always feasible and are insufficient as a stand-alone to achieve SEA and other goals.

Site design

COS 4.4 Require new development in Significant Ecological Areas, to consider the following in design of the project, to the greatest extent feasible: . . .

EHL strongly supports Policy COS 4.4 regarding project design in SEAs, but these same principles should also apply to other natural or agricultural open space.

Implementation

COS 19.4 Pursue innovative strategies for open space acquisition and preservation through the land development process, such as Transfers of Development Rights, Land Banking, and Mitigation Banking, provided that such strategies preserve rural character.

While we support Policy COS 19.4 for a transfer of development rights program, it must be fast-tracked and given far more substance. TDR is an essential mitigation measure for the major economic and urban development now contemplated in the relatively remote and infrastructure poor Antelope Valley. It is vital to save Rural Preserves open space and to successfully implement SEAs. To be effective it must be built into this AVAP, and not be an afterthought in future, uncertain action items. If not built in now, opportunities to planned link density increases with open space preservation will be irretrievably lost, as the equity created and bestowed by up-planning would be given away. We would support a policy that credits protected on-site or off-site open space that has long-term biological value against TDR requirements.

Economic Development Element

We note the major new economic growth contemplated by the plan:

With the availability of land, easy access to transportation corridors and proximity to renewable energy resources, the Antelope Valley is a prime destination for high-tech manufacturing to relocate to as they are more and more crowded out of their current urban locations. One of the main drivers of economic development in the Antelope Valley will be the relocation of high-tech industries to appropriate locations in the unincorporated Antelope Valley

- *Policy ED 1.1: Promote the continued development of regional commercial and industrial employment centers in appropriate areas in the Antelope Valley, including the Fox Field Industrial Corridor.*

- *Policy ED 1.2: Allow the development of commercial and industrial uses at the Palmdale Regional Airport site, provided that those uses are compatible with airport operations and do not restrict or prohibit future expansion of the airport.*
- *Policy ED 1.3: Support the growth of “high-tech” industries to employ the Antelope Valley population’s highly educated workforce*
- *Policy ED 1.4: Support the development of the High Desert Corridor and the Northwest 138 Corridor Improvement projects to improve the east-west movement of goods, particularly between the Antelope Valley and the industrial areas of Kern and San Bernardino counties and beyond.*
- *Policy ED 1.5: Promote the development of an “Inland Port” in the Antelope Valley, providing additional employment in the trade and logistics sectors.*
- *Policy ED 1.6: Support the development of a range of travel options that better connect the Antelope Valley to existing regional trade and employment in other regions, including the High Desert Corridor and the Northwest 138 Corridor Improvement Projects.*

Given that the AVAP proposes such substantial new urban residential, industrial, and commercial development, it is essential that this be *balanced* through SEA expansion, lot size flexibility to protect open space during subdivision, and an effective TDR program that helps implement the Rural Strategy.

Plan Implementation

Significant Ecological Areas

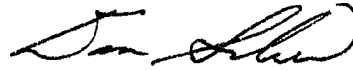
This section calls for frequent—every 2 years—reassessment of SEAs, including their boundaries. While there is nothing inherently wrong with this schedule, given the lengthy nature of public processes, this is virtual continual reassessment. And while public and landowner input is called for, there is *no* mention of the scientific input that made the current boundary revisions credible. SEA boundaries should not be changed absent organized scientific vetting, and this input should be explicitly required in Plan Implementation. Also, given that the current SEA definitions do not include connectivity, the first reassessment should consider adding lands needed for this vital ecological function.

Transfer of Development Rights Program

EHL strongly supports this “placeholder” language. Particularly, important is the notice given to property owners that “development rights transferred into these areas may either be part off or in addition to those densities established by the Land Use Policy Map (Map 2.1) of this Area Plan.” However, it is still essential to move on to program specifics *as quickly as possible*, ideally with adoption concurrent with Area Plan and zoning code adoption. If new zoning regulations are adopted prior to TDR requirements, then landowner expectations will be disconnected from the program and successful implementation will be more difficult.

Thank you for considering our views.

Yours truly,

A handwritten signature in black ink, appearing to read "Dan Silver", with a stylized, cursive script.

Dan Silver
Executive Director

**Palmdale Area Office**

213 East Avenue M
Lancaster, CA 93535

Phone: 661.726.4447
Main Fax: 661.726.4460

www.graniteconstruction.com

September 23, 2014

Carl Nadela,
Department of Regional Planning
320 West Temple St, Room 1354
Los Angeles, CA 90012
Fax: (213) 626-0434
Email: tnc@planning.lacounty.gov

sent via e-mail and US Mail

RE: Antelope Valley Area Plan Update (Town and Country)

Dear Mr. Nadela,

Granite Construction Company (Granite) is a full-service general contractor, construction management firm, and construction materials producer operating in Los Angeles County (County). We specialize in heavy civil and other complex infrastructure projects serving the transportation, industrial, and federal markets. Granite has permitted sand and gravel operations serving the Antelope Valley. These facility produce the aggregate materials (such as road base and asphalt paving materials) used by civil contractors, including ourselves, with the materials needed to build and maintain the roads, highways, and other public infrastructure in the County.

Granite is pleased to provide the below comments on the Town and County Plan Update and Draft Environmental Impact Report.

We note that Policy COS 8:1 of the Antelope Valley Area Plan update (quoted below) does not encourage the development of locally sourced aggregate materials, nor does it provides for the inclusion of new mineral designated areas or zones when identified by the State of California.

Chapter 4 Conservation and Open Space Element II - Goals and Policies Natural Resources – Mineral Resources

Policy COS 8:1: Allow new mineral resource extraction activities in only designated Mineral Resource Areas:

While we applaud the recognition of Mineral Resource Areas, Granite notes that in Public Resource Code Section 2711 (d-f), the State of California encourages a broader approach which favors locally sourced aggregate:

- (d) The Legislature further finds that the production and development of local mineral resources that help maintain a strong economy and that are necessary to build the state's infrastructure are vital to reducing transportation emissions that result from the distribution of hundreds of millions of tons of construction aggregates that are used annually in building and maintaining the state.*

- (e) The Legislature further finds and recognizes the need of the state to provide local governments, metropolitan planning organizations, and other relevant planning agencies with the information necessary to identify and protect mineral resources within general plans.*
- (f) The Legislature further finds that the state's mineral resources are vital, finite, and important natural resources and the responsible protection and development of these mineral resources is vital to a sustainable California.*

Locally sourced aggregate materials provide many economic and environmental benefits over imported materials, including benefits to the economy and environment such as:

- Reduced construction costs due to short haul distances,
- Reduced greenhouse gas emissions associated with trucking distances,
- Reduced road congestion associated with material hauling,
- Reduced road pavement deterioration from heavy truck traffic, and
- Increased local employment

Granite strongly encourages the following additional policies be included in the mineral resources section of the Town & Country's Antelope Valley Plan.

Granite request that Chapter 4 Conservation and Open Space Element II - Goals and Policies Natural Resources – Mineral Resources of Antelope Valley Area Plan be modified to include the following policy goals:

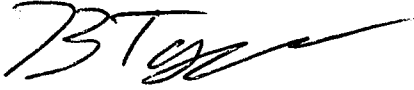
- Policy C/NR 10.1: Protect MRZ-2's and access to MRZ-2s from development and discourage incompatible adjacent land uses.
- Policy C/NR 10.2: prior to permitting a use that would threaten the potential to extract minerals in an identified Mineral Resource Zone, the county shall prepare a statement specifying its reasons for permitting the proposed use, and shall forward a copy to the State Geologist and the board for review in accordance with Public Resources Code subsections 2762 and 2763 as applicable.
- Policy C/NR 10.3: Recognize newly identified MRZ-2s within 12 months of transmittal of information by State Mining and Geology Board.
- Policy C/NR 10.4: Work collaboratively with agencies to identify Mineral Resource Zones and to prioritize mineral land use classifications in regional efforts.
- Policy C/NR 10.5: Manage mineral resources in a manner that effectively plans for the access to, and the development and conservation of mineral resources for existing and future generations.

We note these policy goals are already included as part of the County's General Plan update. Additionally, these requested changes will encourage sustainable planning practices by encouraging the development and use of locally sourced aggregate materials resulting in reduced impacts associated

with importing aggregate materials long distances while additionally aligning the Antelope Valley Area Plan update with State wide goals and policy requirements.

Please feel free to contact me at (661) 387-7735 or william.taylor@gcinc.com to further discuss our request and concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'BTaylor', with a long horizontal flourish extending to the right.

Bill Taylor
Resource Development Project Manager
Granite Construction Company

Mr. Carl Nadela
Los Angeles County Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

Dear Mr. Nadela,

The Antelope Acres has always been included in the Agricultural Opportunity land use designation for the western Antelope Valley. Now, during this year sometime, the designation was changed to an Economic Opportunity Area, with no input from anyone who lives in the Acres.

I do not want where I live to be in an EOA. I do not want to have to wonder what kind of development will happen when someone wants to be a "receiver" and buy development rights from someone else. Already, I have to watch the area being inundated with miles of black solar panels (as viewed from the hills, by the birds, etc.) along with miles of chain link and razor wire fencing, because the County thinks A2 zoning is where industrial solar should go.

I love the rural nature of this area and do not want to worry about creeping industrialization or commercialism. I am asking that the Planners restore the Agricultural Opportunity Area to the Antelope Acres. Change the designation on the map, between 70th Street West and 110th Street West, and south to at least Avenue I from Economic Opportunity Area to Agricultural Opportunity Area. The residents of Antelope Acres are quite capable of determining the type of development they wish to see, which includes removing industrial solar from A2 zoning.

Also, I do not want 90th Street West to become a truck or major highway route. Please restore all Scenic Highways that you have for some reason deleted. The area is still scenic, and we are trying to keep it that way. I want visitors to also feel the area is scenic and rural. Our Rural Preservation Strategy seems to be at odds with what rural living means for us.

Thank you very much.

Sincerely,

Raquel De Cruz
9103 W. Ave. F
Antelope Acres CA.
93536

Mr. Carl Nadela
Los Angeles County Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

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Thank you very much.

Sincerely,

Sherri Myers
9125 W. Ave F
Antelope Acres, Ca
93536

Mr. Carl Nadela
Los Angeles County Regional Planning
320 W. Temple Street, Room 1356
Los Angeles, CA 90012

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Thank you very much.

Sincerely,

Annab Sheldon
9103 W. Ave F
Lancaster, CA.
93536

Mr. Carl Nadela
Los Angeles County Regional Planner
320 W. Temple Street Rm.1356
Los Angeles, CA 90012

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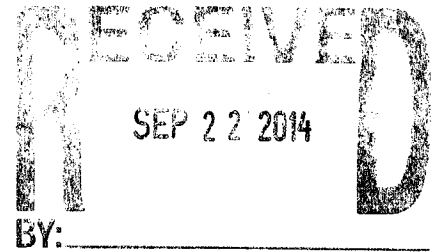
Thank you very much.

Sincerely,

E. Susan G. Reymann
9055 W. Ave J
Lancaster, CA 93536

Gingel's letter

Carl Nadela
Antelope Valley Area-wide General Plan Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012



I have lived in Antelope Acres for over ten years. I chose to live here because it is a small, quiet, beautiful rural community. It is not built up. It is away from busy streets and traffic. It is a safe place to live and to be a cowgirl or cowboy if you want.

I am very concerned with the proposed Antelope Valley Area-wide DEIR Plan. The Rural Preservation Strategy is confounding. How can Town Centers or Town Areas be a part of Antelope Acres when it is supposed to remain rural?

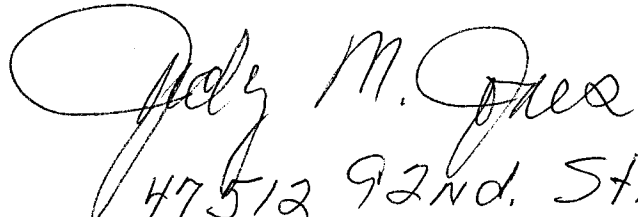
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This is enough. You have to start somewhere. Antelope Acres is the gateway to another lifestyle of farming and raising animals. Preserve all acreage of Antelope Acres as a rural agricultural opportunity area. Don't let development spoil another place that wants to keep its rural character and heritage.

I especially object to more industrial areas around Fox Field because I am afraid 90th Street West will become a conduit for more truck traffic

Please remove Antelope Acres from the Economic Opportunity Area and reinstate it to the Agricultural Opportunity Area or please tell me why you won't do it.

Sincerely,


47512 92nd. St. W.
Antelope Acres, CA. 93536

Carl Nadela
Antelope Valley Area-wide General Plan Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

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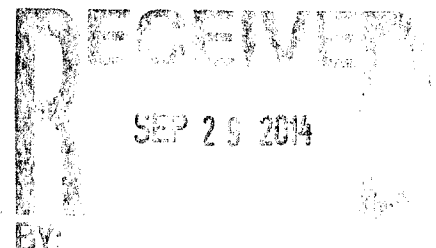
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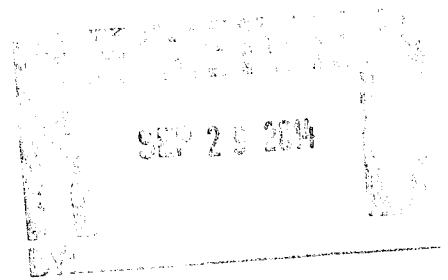
Sincerely,



46330 72 St. West
Antelope Acres,
Ca. 93536



Mr. Carl Nadela
Los Angeles County Regional Planner
320 W. Temple Street Rm.1356
Los Angeles, CA 90012



Dear Mr. Nadela:

The Antelope Acres has always been included in the Agricultural Opportunity land use designation for the western Antelope Valley. Now, during this year sometime, the designation was changed to an Economic Opportunity Area, with no input from anyone who lives in the Acres.

I do not want where I live to be in an EOA. I do not want to have to wonder what kind of development will happen when someone wants to be a "receiver" and buy development rights from someone else. Already I have to watch the area being inundated with miles of black solar panels (as viewed from the hills, by the birds, etc.) along with miles of chain link and razor wire fencing, because the County thinks A-2 zoning is where industrial solar should go.

I love the rural nature of this area and do not want to worry about creeping industrialization or commercialism. I am asking that the Planners restore the AOA to the Antelope Acres. Change the designation on the map, between 70th St. West and 110th Street West, and south to at least Ave J, from CEOA back to AOA. The residents of Antelope Acres are quite capable of determining the type of development they wish to see, which includes removing industrial solar from A-2 zoning.

Also, I do not want 90th St West to become a truck or major highway route. Please restore all Scenic Highways that you have for some reason deleted. The area is still scenic and we are trying to keep it that way. I want visitors to also feel the area is scenic and rural. Your Rural Preservation Strategy seems to be at odds with what rural living means for us.

Thank you very much.

Sincerely,

46330 7257. west
Antelope Acres,
Ca. 93536

Carl Nadela
Antelope Valley Area-wide General Plan Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

I have lived in Antelope Acres for over ten years. I chose to live here because it is a small, quiet, beautiful rural community. It is not built up. It is away from busy streets and traffic. It is a safe place to live and to be a cowgirl or cowboy if you want.

I am very concerned with the proposed Antelope Valley Area-wide DEIR Plan. The Rural Preservation Strategy is confounding. How can Town Centers or Town Areas be a part of Antelope Acres when it is supposed to remain rural?

Please take out all the Economic Opportunity Area that's on all sides of Antelope Acres. There is enough creeping industrial sprawl and commercialism at Fox Field from the warehouses and "business" park there. There is already more traffic, noise, air pollution and intense bright night lights that came with the economic opportunity of that build out. *Looking east, any opportunity to see stars is destroyed by the excessive lights that trespass way beyond the prospective property line. Unfortunately the Dark Sky Ordinance is not used for businesses. Why is that?*

This is enough. You have to start somewhere. Antelope Acres is the gateway to another lifestyle of farming and raising animals. Preserve all acreage of Antelope Acres as a rural agricultural opportunity area. Don't let development spoil another place that wants to keep its rural character and heritage.

I especially object to more industrial areas around Fox Field because I am afraid 90th Street West will become a conduit for more truck traffic

Please remove Antelope Acres from the Economic Opportunity Area and reinstate it to the Agricultural Opportunity Area or please tell me why you won't do it.

Sincerely,

Bill Kelly Darlyn Kelly
7321 W. Ave. "B"
Lancaster Ca. 93536-8618

Mr. Carl Nadela
Los Angeles County Regional Planner
320 W. Temple Street Rm.1356
Los Angeles, CA 90012

Dear Mr. Nadela:

The Antelope Acres has always been included in the Agricultural Opportunity land use designation for the western Antelope Valley. Now, during this year sometime, the designation was changed to an Economic Opportunity Area, with no input from anyone who lives in the Acres.

I do not want where I live to be in an EOA. I do not want to have to wonder what kind of development will happen when someone wants to be a "receiver" and buy development rights from someone else. Already I have to watch the area being inundated with miles of black solar panels (as viewed from the hills, by the birds, etc.) along with miles of chain link and razor wire fencing, because the County thinks A-2 zoning is where industrial solar should go.

I love the rural nature of this area and do not want to worry about creeping industrialization or commercialism. I am asking that the Planners restore the AOA to the Antelope Acres. Change the designation on the map, between 70th St. West and 110th Street West, and south to at least Ave J, from CEOA back to AOA. The residents of Antelope Acres are quite capable of determining the type of development they wish to see, which includes removing industrial solar from A-2 zoning.

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Thank you very much.

Sincerely,

Bill Kelly Darlene Kelly

7321 W. Ave "G"

Lancaster Ca 93536-8618

Carl Nadela
Antelope Valley Area wide General Plan (AVAP) Comments
County of Los Angeles
Department of Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012

There is a beautiful photo of the poppies and the spectacular vista of the western unincorporated Antelope Valley on the title page of the Town and Country Antelope Valley Area Plan (August 2014). Much credit goes to those who have the vision to maintain this rural setting as a gem to the Los Angeles County.

The AVAP must eliminate the Economic Opportunity Areas that are all around the Antelope Acres vicinity to 110th Street West. There should be no town centers or town areas that create magnets for inappropriate growth and development. No more factories, warehouses, stores, truck stops or gas stations are needed in this unincorporated area or anywhere around here. There are enough of them and they are not rural.

Why does the Town and Country want to citify a long-standing rural community? Why would the county make three economic opportunity areas at all? What is the idea of bringing more noise, truck traffic, air pollution, and dividing communities in half by making Highway 138 a truck route? It will be the beginning of sprawl and the spending of highway money for a transportation route that already exists through Tehachapi's Highway 58, which is just a little to the north of here. Does each county have to have its own truck route that runs parallel to each other? The inland port for truckers would be best suited in Mojave where the infrastructure already exists.

No more solar panels and transmission lines should be built here. Renewable energy systems must be on buildings, homes, and to cover parking areas. Utility scale generating facilities belong in industrial zones. Changing zoning from A1 to A2 is not a rural preservation strategy. It is disingenuous to make people feel they are safe in an A-2 zone but are setting themselves up to be eventually surrounded by industrial renewable energy projects.

For the preservation of rural Antelope Acres, smaller divisions of land that are designated as 1 du/1acre (east of 60th Street West) is not necessary and must be taken out of the AVAP. That whole section north and northwest of Fox Field should also reflect the transition of city to country. Please do not deny me and others to come after me, of the wonderful experience that can happen in a real, rural setting.

Sincerely,



Elizabeth Layton
8130 W Ave E-12
Antelope Acres CA 93536

Antelope Valley Area-wide General Plan Comments (AVAP)

Mr. Carl Nadela, AICP
Los Angeles County Regional Planning
320 West Temple Street, Room 1356
Los Angeles, CA 90012
cnadela@planning.lacounty.gov

Dear Mr. Nadela,

I support the expansion of Significant Ecological Areas (SEAs) and preservation and protection of scenic and biological resources. I also support keeping rural areas rural. I am concerned that the AVAP wrongly misdirects development to rural Town Areas and Town Centers with goals and policies that favor commercial, industrial and residential build out all together.

Changing zoning A-1 to A-2 does nothing to promote agriculture, but facilitates the conversion of thousands of acres of land to industrial-scale renewable energy generating facilities. For a generation or more, previously farmed agricultural property will be gone. Please remove this proposed land use. Renewable energy must be on homes, buildings, and parking roofs. County and cities should be the first to consent to regulation or conservation directives to reduce excessive and redundant kw usage.

Economic Opportunity Areas do not belong in Antelope Acres and the distant areas of the Antelope Valley. There does not need to be any more build out of the low-density, rural communities. Agricultural Opportunity Areas need to be re instated into the AVAP to show there is a serious consideration for conserving our agricultural heritage.

Rural Preserve Areas designated for commercial or industrial use would not be preserves. They would become commercial or industrial areas. There are enough non-rural 'amenities' in nearby incorporated cities that serve rural residential needs in every way.

Metro and Caltrans planned major infrastructure 'improvement' to the NW138 is to prepare the west Antelope Valley for major urban sprawl. It will divide established rural communities in half. The 'upgrade' will promote more traffic and encourage development of unnecessary and unwanted redundant commercial and industrial services to locations where not desired. Parallel functioning highways currently exist to the north. Inappropriate development of infrastructure conflicts with the area's rural lifestyle.

The Centennial project is a growth-inducing plan for urban sprawl and leapfrog development. To better reflect (and preserve for our grandchildren) the rural

environment of the western Antelope Valley, please change the land use to lower densities and remove all industrial and commercial zones.

Water adjudication hearings continue today. The Plan should reflect additional restrictions on usage that would cause the loss of remaining vernal pools, springs, seeps, and other natural watershed environments via excessive pumping or pollution from any kind of development.

Water supplies for development should be sustainable in perpetuity, not just “sustainable”. There are limits to how much water may be imported, as evidenced by the current drought conditions and lack of available imported surface water, which encourages local groundwater pumping, in turn affecting local sources of surface water listed above.

Water availability should be prioritized to current users, then to other development.

All renewable energy facilities must use tertiary treated water or water from outside the Antelope Valley basin for construction or maintenance. Groundwater shall not be used on the site or transferred off the site property.

Please remove the priority designations from the Scenic Drives Map. Please remove industrial and private uses that interfere with the scenic and biologic resources. Renewable energy facilities, solar panels, wind systems, towers, **shall not** be on significant ridgelines, hillside management areas, scenic resource areas, SEAs, and so on. The SEAs should not be reviewed every two years unless developers fund biological studies to determine the effects of their development in sensitive areas at the same time.

Please reinstate West Avenue K and 110th Street West and Pearblossom Highway as scenic roads. Please add 90th Street West from Avenue J to A; 170th St. East north to East Avenue J, east to 200th Street East, north to East Avenue C to include Phacelia and Butte Valley Wildlife Sanctuaries; west on East Avenue O, north on 150th Street East, east to 170th Street East, to include the area around the Indian Museum and Piute Butte.

Transfer of Development Rights (TDRs) should not focus increasing densities in rural town centers, areas, and preserves, but directed to already high-density zoned areas with adequate infrastructure.

Plan amendments and TDR plans should be required to involve extensive public participation and no guarantees in the AVAP that will require those plans without community approval.

Please add “preserve desert and forest areas as carbon sequestering environments”, not just promotion of tree-planting in urban and suburban areas.

Please downgrade the designations of rural and rural scenic roads from "Major Highways" to "Limited Secondary Highways".

Mitigation lands should not only be directed to SEAs, but to areas around public trust lands like County Sanctuaries and State Parks, as well as public and private conservation lands.

The Urbanization of Rural should not be the idea for the Antelope Valley Area Plan. There must be a cutoff somewhere. Lancaster almost makes where I live an island. I am requesting changes that would preserve a historical, rural culture. Please revise the Plan to preserve the agricultural heritage and beautiful nature of the scenic landscapes. Please conserve the wildlife and native vegetation. Trails for horses and hikers and good grade for bicycle paths should be a priority over highway improvements for vehicular traffic. This would be the start of exceptional planning.

Sincerely,

Judith Fuentes
47458 92nd St. W.
Antelope Acres, CA 93536